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General Manager, Markets Branch
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001

By Email: AERInquiry@aer.gov.au

AER Retail Market Performance Reporting – position paper

Country Energy welcomes the opportunity to respond to the Australian Energy Regulator (AER) on the position paper – Retail Market Performance Reporting.

In Attachment 1 to this letter, Country Energy provides a response to each of the indicators proposed by the AER. In addition, Country Energy has a number of broader concerns that apply more generally to the proposed indicators; details of these are provided immediately below.

Firstly, Country Energy is concerned that the majority of the individual indicators are to be reported quarterly. This imposes a significant administrative compliance burden, and hence cost, to retailers. Our suggestion is that the AER considers identifying those indicators that it considers to be essential for quarterly reporting. The remaining indicators could be reported on a bi-annual or annual basis to help minimise the implementation costs.

For instance, for any new or changed indicators as proposed by the AER, Country Energy will be required to:

- develop, test and re-apply a query to extract the required data;
- train, and/or add new resources to run, review, cleanse and analyse the data before submission to the AER;
- develop new processes and procedures to capture the required information;
- provide additional training and implement system changes for all frontline staff to enable accurate and timely capture of new information: this will, in turn, increase the time and cost associated with assisting customers.

Secondly, our current Customer Information System holds debt information at the debtor number level rather than at a premise or service level. Therefore any customer with both electricity and gas accounts connected under the one debtor number has debt arrears stored for the debtor in total. Country Energy is not presently able to identify the proportion of debt attributable to each energy source. To address this issue would require significant system changes at a material cost to Country Energy.

If you have any questions in relation to this submission, please contact Gerard Lang on
02 6338 3410.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Adams', with a horizontal line underneath and a small flourish at the end.

John Adams
Executive General Manager Retail

Att. 1.

Attachment 1: Country Energy's response to the Final Decision and associated regulatory amendments

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.1.1 Retail Market Structure</p> <p>A.1.1.1 The number of customers on standard retail contracts</p>	<p>Retailers are required to submit the total number of standard retail contracts for the supply of energy held on the last calendar day of the relevant reporting period in each of the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers • Small market offer customers • Large customers <p>Small market offer customers are a subset of small business customers. For the purposes of this indicator, the number of contracts held by small business customers must be presented as including small market offer customers. A customer who purchases both gas and electricity under a single standard retail contract with a retailer should be counted as one electricity customer and one gas customer. Standard retail contract has the meaning given in section 2 of the Retail Law.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p> <p>Country Energy is unclear as to why 'small market offer' and 'large customers' are included in this measure as standard retail contracts are only applicable to small customers who are not being sold energy under a market retail contract.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.1.1.2 The number of customers on market retail contracts</p>	<p>Retailers are required to submit the total number of market retail contracts for the supply of energy held on the last calendar day of the relevant reporting period in each of the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers • Small market offer customers • Large customers <p>Small market offer customers are a subset of small business customers. For the purposes of this indicator, the number of contracts held by small business customers must be presented as including small market offer customers. A customer who purchases both gas and electricity under a single market retail contract with a retailer should be counted as one electricity customer and one gas customer. Market retail contract has the meaning given in section 2 of the Retail Law</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p> <p>Further clarification is required on the definition of 'small market offer' customers.</p>
<p>A.2 Handling of customers experiencing payment difficulties</p> <p>A.2.1.1 Number of small customers repaying an energy bill debt</p>	<p>A retailer must report the total number of customers repaying an energy bill debt on the last day of the relevant reporting period, by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers (excluding hardship program customers) • Small business customers. <p>Energy bill debt is the dollar amount owed to the retailer for the sale and supply of gas or electricity, excluding other services, which has been outstanding to the energy retailer for a period of 90 days or more.</p> <p>An amount owing after the final bill has been issued by a retailer to a customer on termination of a customer</p>	<p>Quarterly</p>	<p>Country Energy cannot fully comply with this indicator. Currently our billing system does not report based on premise type. Our reporting is based on Country Energy classifications of customer type. To re-allocate customer type categories to those suggested by the AER would require Country Energy to review and investigate each customer in the billing system to ensure they fit with the AER proposal. This would represent significant time, administration and financial burden to Country Energy in order to comply.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.2.1.2 Average amount of energy bill debt for small customers</p>	<p>contract (e.g. where a customer changes retailer) should not be counted as <i>energy bill debt</i>.</p> <p>A retailer must report the average amount of energy bill debt (as defined in A.2.1.1) owed by those customers who are in debt (as reported under A.2.1.1) on the last day of the relevant reporting period, by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers (excluding hardship program customers) • Small business customers <p>The average amount of energy bill debt should be calculated as the total amount of energy bill debt (for the relevant customer category) divided by the number of customers in debt (as reported under A.2.1.1 for the relevant customer category).</p>	<p>Quarterly</p>	<p>Country Energy cannot fully comply with this indicator. Please see the comment above.</p>
<p>A.2.1.3 Level of residential customer energy bill debt</p>	<p>A retailer must report the number of residential customers (excluding hardship program customers) with energy bill debt (as defined in A.2.1.1) on the last day of the relevant reporting period who owe:</p> <ul style="list-style-type: none"> • over \$500 but less than or equal to \$1500, • over \$1500 but less than or equal to \$2500, and • over \$2500 	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.2.2 Centrepay</p> <p>A.2.2.1 Number of residential customers using Centrepay</p>	<p>A retailer must report the number of residential customers using Centrelink's Centrepay to pay their energy bills on the last day of the relevant reporting period.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.2.3.Payment Plans</p> <p>A.2.3.1 Number of residential customers (excluding hardship program customers) on a payment plan</p>	<p>A retailer must report the total number of residential customers (excluding hardship program customers) on a payment plan on the last calendar day of each month within the relevant reporting period. Payment plan means a plan for a residential customer experiencing payment difficulties to pay a retailer by periodic instalments, any amount payable by the customer. A payment plan should only include an arrangement in which the customer is paying off an arrears component and consists of at least three instalments. Customers using a payment plan for convenience or flexible budgeting purposes should be excluded for the purposes of this indicator.</p>	<p>Quarterly, with monthly data</p>	<p>Country Energy has over 70,000 customers on payment plans and others on arrangements which may extend over 3 instalments or more. Country Energy's existing information systems are unable to uniquely identify those customers who have chosen to enter into an arrangement to pay instalments (via a payment plan) because of budgeting or convenience purposes as opposed to those customers who have hardship issues. Country Energy can separate those customers with arrears above a set figure at the commencement of the plan or arrangement, however many customers choose this payment option for convenience when they have arrears. New reports will be required for this item to include arrangements as well as plans.</p>
<p>A.2.3.2 Number of payment plans successfully completed</p>	<p>A retailer must report the number of residential customers (excluding hardship program customers) who successfully completed their payment plan (as defined in A.2.3.1) within each calendar month of the relevant reporting period. Successfully completed a payment plan occurs when a customer has paid of any arrears in full and is returned by agreement with the retailer to a normal billing and collection cycle, including where they agree to a new flexible payment arrangement.</p>	<p>Quarterly, with monthly data</p>	<p>Country Energy payment plans 'roll over' each year and the separation of plans based on flexible budgeting arrangements versus financial difficulty cannot be made.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.2.3.3 Number of payment plans cancelled by the retailer for non-payment</p>	<p>A retailer must report the number of payment plans (as defined in A.2.3.1) cancelled by the retailer for non-payment within each calendar month of the relevant reporting period. A payment plan is cancelled for non-payment when the retailer cancels or terminates the payment plan as a result of the customer failing to make or pay instalments agreed to under the plan.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p>
<p>A.2.3.4 Number of residential customers (excluding hardship program customers) with two or more payment plans cancelled for non-payment in the last 12 months</p>	<p>A retailer must report the number of residential customers (excluding hardship program customers) with two or more payment plans (as defined in A.2.3.1) cancelled for non-payment (as defined in A.2.3.3) by the retailer in the previous 12 months, within the relevant reporting period. The previous 12 months is the 12 month (four quarter) period prior to the end of (but including) the relevant reporting period.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.3 De-energisation (disconnection) and re-energisations (reconnection).</p> <p>A.3.1.1 Number of residential and small business customers disconnected for non-payment</p>	<p>A retailer must report the total number of customers disconnected for reasons of non-payment in each calendar month of the relevant reporting period, by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers <p>Premises that are vacant at the time of disconnection should be excluded for the purposes of this indicator. Only completed disconnections should be reported. Where a disconnection has been requested by a retailer but not completed within the relevant reporting period, it should not be included in the total for that period. <i>Disconnection</i> has the meaning given in section 2 of the Retail Law.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category. Please note that Country Energy is not easily able to identify whether or not a premise was abandoned at the time of disconnection.</p>
<p>A.3.1.2 Number of residential and small business customers disconnected for non-payment on more than one occasion in the same name and at the same address in the previous 24 months</p>	<p>A retailer must report the total number of customers disconnected (as defined in A.3.1.1), in the same name and at the same address, for reasons of non-payment on more than one occasion in the previous 24 months, by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers <p>The previous 24 months is the 24 month period prior to the end of (but including) the calendar month to which the report applies.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.3.1.3 Number of residential and small business customers reconnected within 7 days of disconnection, in the same name and at the same address</p>	<p>A retailer must report the total number of customers reconnected, in the same name and at the same address, within 7 calendar days of disconnection for non-payment in each calendar month of the relevant reporting period, by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers <p>Only completed reconnections should be reported. Where a reconnection has been requested by a retailer but not completed within the relevant reporting period, it should not be included in the total for that period. The seven (7) calendar days are inclusive, and the first calendar day should be counted as the day that the disconnection occurred. If the 7 day period for reconnection spans two calendar months (or two reporting periods), an instance of disconnection and reconnection within 7 days for the purposes of this indicator should be reported as occurring in the calendar month/reporting period in which reconnection actually occurred. Disconnection and Reconnection have the meanings given in section 2 of the Retail Law.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.3.1.4 Number of residential and small business customers reconnected in the same name at the same address (regardless of the date of disconnection)</p>	<p>A retailer must report the total number of customers reconnected, in the same name and at the same address, after disconnection for non-payment in each calendar month of the relevant reporting period, by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers <p>Only completed reconnections should be reported. Where a reconnection has been requested by a retailer but not completed within the relevant reporting period, it should not be included in the total for that period. Disconnection and Reconnection have the meanings given in section 2 of the Retail Law.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p>
<p>A.3.1.5 Number of hardship program customers disconnected for non-payment</p>	<p>A retailer must report the total number of hardship program customers disconnected for reasons of non-payment (as defined in A.3.1.1) in the relevant reporting period.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category. Also we seek clarification that this means customers on the hardship program who have not been exited back to normal credit conditions because we have been unable to contact the customer, or the customer is unwilling to work within the program.</p>
<p>A.3.1.6 Number of hardship program customers reconnected within 7 days of disconnection, in the same name and at the same address</p>	<p>A retailer must report the total number of hardship program customers reconnected, in the same name and at the same address, within 7 days of disconnection for non-payment (as defined in A.3.1.3) in the relevant reporting period.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category. Also we seek clarification that this means customers on the hardship program who have not been exited back to normal credit conditions because we have been unable to contact the customer, or the customer is unwilling to work within the program.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
A.3.1.7 Number of energy concession customers disconnected for non-payment	A retailer must report the total number of energy concession customers (as defined in A.4.1.1) disconnected for reasons of non-payment (as defined in A.3.1.1) in the relevant reporting period.	Quarterly	New reports will be required to be produced but it is our expectation that Country Energy can report on this category.
A.3.1.8 Number of energy concession customers reconnected within 7 days of disconnection, in the same name and at the same address	A retailer must report the total number of energy concession customers (as defined in A.4.1.1) reconnected, in the same name and at the same address, within 7 days of disconnection for non-payment (as defined in A.3.1.3) in the relevant reporting period.	Quarterly	New reports will be required to be produced but it is our expectation that Country Energy can report on this category.
A.3.1.9 Number of residential customers (excluding hardship program customers) disconnected for non-payment of a bill who were on a payment plan in the previous 12 months	A retailer must report the total number of residential customers (excluding hardship program customers) disconnected for reasons of non-payment of a bill (as defined in A.3.1.1) in the relevant reporting period who were on a payment plan (as defined in A.2.3.1) in the previous 12 months. The previous 12 months is the 12 month (four quarter) period prior to the end of (but including) the relevant reporting period.	Quarterly	New reports will be required to be produced but it is our expectation that Country Energy can report on this category.

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.3.1.10 Number of residential customers (excluding hardship program customers) who were on a payment plan in the previous 12 months who were reconnected within seven days of disconnection in the same name and at the same address</p>	<p>A retailer must report the total number of residential customers (excluding hardship program customers) reconnected in the same name and at the same address (as defined in A.3.1.3), within 7 calendar days of disconnection for non-payment in the relevant reporting period who were on a payment plan (as defined in A.2.3.1) in the previous 12 months. The previous 12 months is the 12 month (four quarter) period prior to the end of (but including) the relevant reporting period.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p>
<p>A.4 Concessions A.4.1.1 Number of residential customers recorded by the retailer as entitled to a government funded energy concession administered or delivered by the retailer</p>	<p>A retailer must report the number of energy concession customers held on the last day of the relevant reporting period. Where multiple concessions (or rebates) have been applied to a customer's account during the reporting period, this should be counted as one customer. Customers who are recorded by the retailer as receiving a concession which is applied on a seasonal basis (for example, the Winter Energy Concession in Victoria) should be reported in all reporting periods, even during periods where the concession (or rebate) is not applied to their account, as long as they remain eligible for the concession. Customers who only receive a concession which is not administered or delivered by the retailer (for example, Queensland's Medical Cooling and Heating Electricity Concession Scheme) should be excluded for the purposes of this reporting.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
A.5 Prepayment Meters	A retailer must report the total number of residential customers using a prepayment meter system on the last day of the relevant reporting period. Retailers will be required to report on all PPM customers (customers using a prepayment meter (PPM) system) in each jurisdiction regardless of the applicability of the Customer Framework prepayment meter provisions for the particular state. This will also include PPM customers in a trial period. Prepayment meter system (PPM) has the meaning given in section 2 of the Retail Law. Prepayment meter market retail contract has the meaning given in section 2 of the Retail Law. Trial period has the meaning given in clause 127 and 130(2) of the Retail Rules	Quarterly	Pre payment meters are not a current product offering for Country Energy. A null return would be provided.
A.5.1.1 Total number of PPM customers			
A.5.1.2 Number of PPM customers that receive an energy concession	A retailer must report the total number of PPM customers (as defined in A.5.1.2) that are energy concession customers (as defined in A.4.1.1) as at the last day of the relevant reporting period.	Quarterly	Pre payment meters are not a current product offering for Country Energy. A null return would be provided.
A.5.1.3 Number of PPMs removed due to payment difficulties	A retailer must report the number of PPMs removed due to payment difficulties, including those PPMs which have been removed due to payment difficulties during a trial period, in the relevant reporting period. Removal of a prepayment meter system has the meaning given in r.127 of the Retail Rules. For the purposes of this indicator, a PPM should be reported as having been removed due to payment difficulties if it has been removed in response to a request or offer made under r.141(2) of the Retail Rules.	Quarterly	Pre payment meters are not a current product offering for Country Energy. A null return would be provided.

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.5.1.4 Number of PPM customers using a PPM system capable of detecting and reporting self-disconnections</p>	<p>A retailer must report the total number of PPM customers (as defined at A.5.1.1) using a PPM system which is capable of identifying to the retailer every instance of a small customer's self-disconnection and the duration of that self-disconnection, as required under r.141 of the Retail Rules, on the last day of the relevant reporting period. Self-disconnection has the meaning given in r.127 of the Retail Rules.</p>	<p>Quarterly</p>	<p>Pre payment meters are not a current product offering for Country Energy. A null return would be provided.</p>
<p>A.5.1.5 Total number of PPM self-disconnection events</p>	<p>A retailer must report the total number of self disconnection events for PPM customers (including self disconnection events which occurred during the trial period) during the relevant reporting period. Self-disconnection event means an instance of self-disconnection, as defined in r.127 of the Retail Rules. Where a single customer self disconnects more than once during the relevant reporting period, each self disconnection event must be reported separately.</p>	<p>Quarterly</p>	<p>Pre payment meters are not a current product offering for Country Energy. A null return would be provided.</p>
<p>A.5.1.6 Total number of PPM customers self-disconnected</p>	<p>A retailer must report the total number of PPM customers that self disconnected (including all instances of self-disconnecting during the trial period) during the relevant reporting period. Where a single customer self-disconnects more than once during the relevant reporting period, this must be recorded as one customer self-disconnecting.</p>	<p>Quarterly</p>	<p>Pre payment meters are not a current product offering for Country Energy. A null return would be provided.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
A.5.1.7 Average duration of self-disconnection events	A retailer must report the average duration of all self-disconnection events that occurred during the relevant reporting period. The average duration is calculated by summing the duration of all self-disconnection events in the relevant reporting period and dividing this by the total number of self-disconnection events. The duration of an individual self disconnection event will commence from the time supply to the customer's premise is interrupted until the time at which supply is restored.	Quarterly	Pre payment meters are not a current product offering for Country Energy. A null return would be provided.
A.5.1.8 Duration of self-disconnection events	A retailer must report on the number of self-disconnection events during the relevant reporting period where the duration (as defined in A.5.1.7) was: <ul style="list-style-type: none"> • Between 0 minutes and 12 hours, • Over 12 hours but less than 48 hours, • Over 2 days but less than 7 days, and • Over 7 days 	Quarterly	Pre payment meters are not a current product offering for Country Energy. A null return would be provided.
A.6 Security Deposits A.6.1.1 Number and aggregate value of security deposits held by retailers for residential and small business customers	A retailer must report the number and aggregate (total) value of security deposits held as a security against non-payment of a bill on the last calendar day of the relevant reporting period for the following customer categories: <ul style="list-style-type: none"> • residential customers • small business customers Security deposit has the meaning given in r.3 of the Retail Rules.	Quarterly	New reports will be required to be produced but it is our expectation that Country Energy can report on this category.

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.6.1.2 Number and aggregate value of security deposits held for longer than 12 months for residential customers and 24 months for small business customers</p>	<p>A retailer must report the number and aggregate (total) value of security deposits, as at the last calendar day of the relevant reporting period:</p> <ul style="list-style-type: none"> • from residential customers that have been held by the retailer for longer than 12 months • from small business customers that have been held by the retailer for longer than 24 months. <p>Where a security deposit is due to be returned to a customer within the relevant reporting period and has not been returned, that security deposit must be recorded as one entry, and its value added to the total value of security deposits in that category. Security deposit has the meaning given in r.3 of the Retail Rules.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.7 Customer Service A.7.1.1 Total number of calls to an operator</p>	<p>A retailer must report the total number of calls received by an operator or customer service officer/representative, including sales calls and any abandoned calls, in the relevant reporting period. This should also include calls received by third parties such as contractors or marketing agents acting on behalf of a retailer. Data can be provided on a national basis, and is not required to distinguish between participating jurisdictions. Retailers are not required to distinguish between electricity and gas callers, or customer categories. Where a retailer uses an Automated or Integrated Voice Response (IVR) telephone system, it should exclude any calls not requiring the operator's attention or abandoned before the customer opts to speak to an operator. Automated or Integrated Voice Response (IVR) telephone systems include technology which allows customers to service their own enquiries by following the instructions and navigating menu choices via the telephone keypad or by speech recognition.</p>	<p>Quarterly</p>	<p>This measure can be reported.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.7.1.2 Number and percentage of calls forwarded to an operator that are answered within 30 seconds.</p>	<p>A retailer must report the total number and percentage of calls forwarded to an operator that are answered within 30 seconds in the relevant reporting period. Where retailers use an Automated or Integrated Voice Response (IVR) telephone system, monitoring should commence from when the caller chooses to speak to an operator. In the case of non-IVR systems, the time commences when the call is received by the switchboard. Where the call centres provide an option to call the customer back within a defined period of time (rather than have the customer wait on hold until the next operator is available), the call will be considered to have been answered within 30 seconds, providing the caller selected the option within 30 seconds and the telephone call was returned by the call centre within the defined time period. The percentage of operator calls responded to within 30 seconds indicator is calculated by dividing the number of operator calls responded within 30 seconds by the total number of calls to an operator. Data can be provided on a national basis, and is not required to distinguish between participating jurisdictions. Retailers are not required to distinguish between electricity and gas callers, or customer categories.</p>	<p>Quarterly</p>	<p>This measure can be reported.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.7.1.3 Average time before an operator answers a call</p>	<p>A retailer must report the average time waited by callers before a call is answered by an operator in the relevant reporting period. This indicator is calculated by dividing the total time waited by callers (before their telephone call was answered by an operator) by the total number of calls to an operator. Only answered calls should be included. In reporting against this indicator, retailers should not include details of abandoned calls or the average waiting time before a call is abandoned. Where a caller to an Automated or Integrated Voice Response (IVR) telephone system seeks to talk to an operator, monitoring of the call waiting time should commence when the caller selects the relevant IVR operator option and conclude when an operator picks up the call to speak to the customer. For non IVR systems, the monitoring time should commence when the call is received by the switchboard and cover the time until an operator picks up the call and is able to deal with the customer's inquiry rather than place the customer back in a queue, including any time spent in a queue. Data can be provided on a national basis, and is not required to distinguish between participating jurisdictions. Retailers are not required to distinguish between electricity and gas callers, or customer categories.</p>	<p>Quarterly</p>	<p>This measure can be reported.</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.7.1.4 Number and percentage of calls abandoned before being answered by an operator.</p>	<p>A retailer must report the total number and percentage of calls abandoned before being answered by an operator in the relevant reporting period.</p> <p>Abandoned calls include those calls where the caller hangs up before speaking to an operator and includes those calls that were abandoned in under 30 seconds. For retailers with IVR systems, this should only include the number of calls abandoned where the caller chooses to speak to an operator, and abandons the call after that choice is recorded. The percentage of calls abandoned is calculated as the percentage of the total number of calls to an operator reported (as defined in A.7.1.1). Data can be provided on a national basis, and is not required to distinguish between participating jurisdictions.</p> <p>Retailers are not required to distinguish between electricity and gas callers, or customer categories.</p>	<p>Quarterly</p>	<p>This measure can be reported.</p>
<p>A.8 Complaints A.8.1.1 Complaints – total</p>	<p>A retailer must report the total number of complaints made by small customers in the relevant reporting period by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers. <p>Separate reporting for gas and electricity complaints is not required. (The total number of complaints reported under this indicator will be equal to the total number of complaints recorded under A.8.1.2 to A.8.1.5 below.)</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.8.1.2 Complaints – marketing</p>	<p>A retailer must report the total number of marketing complaints made in the relevant reporting period by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers. <p>Separate reporting for gas and electricity complaints is not required. Marketing complaint means a complaint associated with a retailer's or its agents/representatives' actions in seeking to sign up a small customer for a contract for energy supply/service and may include matters such as the sales approach or conduct, advertising campaigns, contract terms, sales techniques, misleading conduct, etc.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.8.1.3 Complaints - billing</p>	<p>A retailer must report the total number of billing complaints made in the relevant reporting period by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers. <p>Separate reporting for gas and electricity complaints is not required. Billing complaint means a complaint regarding prices, overcharging, high bills, billing errors, payment terms and methods, failure to receive government rebates and debt recovery practices, etc.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.8.1.4 Complaints – customer transfers</p>	<p>A retailer must report the total number of customer transfer complaints made in the relevant reporting period by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers. <p>Separate reporting for gas and electricity complaints is not required. Customer transfer complaint means a complaint regarding the financial responsibility for a customers NMI or MRN being transferred to a market contract with either an existing or new retailer and may also include general transfer complaints such as failure to transfer within a certain period, disruption of supply due to transfer and billing problems directly associated with transfer, etc.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.8.1.5 Complaints – Other</p>	<p>A retailer must report the total number of other complaints made in the relevant reporting period by reference to the following customer categories:</p> <ul style="list-style-type: none"> • Residential customers • Small business customers <p>Separate reporting for gas and electricity complaints is not required. Other complaints include any complaint not included in the definitions of marketing, billing and customer transfer complaints above.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.9 Complaints – Other</p> <p>A.9.1.1 Number of customers on a retailer's hardship program</p>	<p>A retailer must report the total number of residential customers on their hardship program (hardship program customers) as at the last calendar day of each month in the relevant reporting period. To be on a retailer's hardship program means the customer has been accepted into the retailer's hardship program and removed from the normal debt collection activity.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.9.1.2 Number of hardship program customers recorded by the retailer as entitled to receive a government funded energy concession, administered or delivered by the retailer</p>	<p>A retailer must report the total number of hardship program customers that are entitled to receive a government funded energy concession (as defined in A.4.1.1) as at the last day of the relevant reporting period.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.9.1.3 Number of customers denied access to the hardship program</p>	<p>A retailer must report the total number of residential customers who are denied access to their hardship program in each month in the relevant reporting period. Denied access means a residential customer who is referred to the hardship program by any means (e.g. identified by the retailer or self-identified by the customer or by a third-party) but who is not accepted onto the hardship program. This does not include customers who decline to participate in the program.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.9.1.4 Average debt upon entry into the hardship program</p>	<p>A retailer must report the average energy bill debt (as defined in A.2.1.1) for hardship program customers upon entry into the hardship program as at the last calendar day of each month in the relevant reporting period. This indicator is calculated only for customers who entered the program in the relevant calendar month. It is calculated by summing the energy bill debt of those hardship program customers who entered the hardship program in the relevant month (as recorded on the last day of the month in which they entered the program), and dividing this by the number of hardship program customers who entered the program in the relevant calendar month.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.9.1.5 Levels of debt of customers entering the hardship program</p>	<p>A retailer must report as at the last calendar day of each month in the relevant reporting period, the number of hardship program customers entering the hardship program, with an energy bill debt (as defined in A.9.1.4) of</p> <ul style="list-style-type: none"> • Between \$0 and \$500 • Over \$500 but less than \$1,500 • Over \$1,500 but less than \$2,500 • \$2,500 or more 	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.9.1.6 Average debt of hardship program customers</p>	<p>A retailer must report the average energy bill debt (as defined in A.2.1.1) of hardship program customers as at the last calendar day of each month in the relevant reporting period. This indicator is calculated as the total energy bill debt of all hardship program customers as at the last calendar day of each month in the relevant reporting period, divided by the number of hardship program customers.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.9.1.7 Proportion of hardship program customers who are:</p> <ul style="list-style-type: none"> • Not meeting ongoing energy costs (debt increasing); • Covering ongoing energy costs (debt stable); • Covering ongoing energy costs and portion of arrears (debt reducing). 	<p>A retailer must report as at the last calendar day of the relevant reporting period, the proportion of hardship program customers who are:</p> <ul style="list-style-type: none"> • Not meeting ongoing energy costs (debt increasing); • Covering ongoing energy costs (debt stable); • Covering ongoing energy costs and arrears (debt reducing). <p>Each category above should be reported as a percentage of the total number of hardship program customers. Not meeting ongoing energy costs is either where the hardship program customer's regular payment amount (for example, weekly, fortnightly, monthly etc) does not equal the payment amount (for the required payment frequency) calculated by the retailer to meet the customer's expected energy bill costs over the next 12-month period; or where the hardship program customer's energy bill debt at the end of the quarter is more than 10 per cent higher compared to 6 months prior.</p> <p>Covering ongoing energy costs and arrears is either where the hardship program customer's regular payment amount (for example, weekly, fortnightly, monthly etc) exceeds the payment amount (for the required payment frequency) calculated by the retailer to meet the customer's expected energy bill costs over the next 12-month period; or where the hardship program customer's energy bill debt at the end of the quarter is more than 10 per cent less compared to 6 months prior. Where the second option is supported for reporting</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
	<p>against this indicator; retailers will also be required to report the proportion of hardship program customers who were not in the hardship program 6 months prior or for whom data on debt levels 6 months prior is not available.</p>		
<p>A.9.1.8 Customers who are managing their payment plans (payment plan success rate)</p>	<p>A retailer must report the proportion of hardship program customers who are managing payment plans as at the last calendar day of the relevant reporting period. This indicator is calculated as the number of hardship program customers who the retailer considers as making payments towards their agreed payment arrangement, as a percentage of the total number of payment arrangements under the hardship program.</p>	<p>Quarterly</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.9.1.9 Number of customers exiting the hardship program</p>	<p>A retailer must report the number of customers who exit hardship program in each month in the relevant reporting period</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>
<p>A.9.1.10 Number of customers who:</p> <ul style="list-style-type: none"> • Successfully completed the program or exited the hardship program by agreement with the retailer; • Were excluded from the program for non-compliance; 	<p>A retailer must report the number of residential customers who, in each month in the relevant reporting period:</p> <ul style="list-style-type: none"> • Successfully completed the program or exited the hardship program by agreement with the retailer; • Were excluded or removed from the program for non-compliance; • Left the retailer. <p>Successfully completed the program or exited the hardship program by agreement with the retailer is where a customer has completed or exited the hardship program and is returned, by agreement with the retailer, to the normal billing and collection cycles (including</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<ul style="list-style-type: none"> Transferred away from the retailer. 	<p>where the customer agrees to a new payment arrangement). Excluded or removed from the program for non-compliance is where a customer exits the hardship program at the behest of the retailer for failing to adhere to the program requirements. This may include instances where the hardship program customer fails to make contact with the retailer or make agreed payments towards their energy account. Customers who leave the hardship program because they feel they are unable to continue to meet the program requirements or payments requested by the retailer should be reported here. Left the retailer includes customers who exit the hardship program because they are no longer a customer of that retailer. This will include customers who have transferred or switched to another retailer and those who have changed retailers through moving premises etc.</p>	<p>Quarterly, with monthly data</p>	<p>New reports will be required to be produced but it is our expectation that Country Energy can report on this category. However, Country Energy has concerns over the intent of this indicator. The AER has suggested that this measurement could provide an indication of the extent to which the retailer's hardship program has failed or succeeded – as a result of the degree of change in customer behaviour. Country Energy does not agree with the AER's view, as the intent of the Hardship program is to avoid disconnecting a customer who may be in hardship by working with the customer to assist in payment of debt. The</p>
<p>A.9.1.11 Number of residential customers disconnected for non-payment of a bill who successfully completed the hardship program in the previous 12 months</p>	<p>A retailer must report the total number of residential customers who were disconnected for non-payment (as defined in A.3.1.1) in each month of the relevant reporting period who successfully completed the hardship program (as defined in A.9.1.10) in the previous 12 months. The previous 12 months is the 12 month period prior to the end of (but including) the calendar month to which the report applies.</p>		

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
<p>A.9.1.12 Number of residential customers who successfully completed the hardship program in the previous 12 months who were reconnected in the same name and at the same address within seven days of disconnection</p>	<p>A retailer must report the total number of residential customers reconnected, in the same name and at the same address, within 7 days of disconnection for non-payment (as defined in A.3.1.3) in the relevant reporting period who successfully completed the hardship program (as defined in A.9.1.10) in the previous 12 months. The previous 12 months is the 12 month period prior to the end of (but including) the calendar month to which the report applies.</p>	<p>Quarterly, with monthly data</p>	<p>expectation that the retailer is to change the behaviour of the customer is, in the view of Country Energy, unreasonable. Furthermore, our understanding was that this was never the intent of the Hardship program. In the view of Country Energy, this indicator should not be used to assess the success or failure of retailer hardship programs. New reports will be required to be produced but it is our expectation that Country Energy can report on this category</p>

Indicator	Relevant Definitions	Relevant reporting period	Country Energy response
A.9.1.13 Assistance provided to hardship program customers	A retailer must report the number of hardship program customers who, in the relevant reporting period: <ul style="list-style-type: none"> • Were notified of government concessions or grants • Were notified of, or referred to, a financial counselling service • Received energy efficiency information (including a telephone energy audit or the provision of leaflets etc.) • Had their prepayment meter (PPM) removed • Had their market retail contract reviewed Retailers are also able to report on the other types of assistance available and provided to the hardship program customers.	Quarterly	New reports will be required to be produced but it is our expectation that Country Energy can report on this category
A.9.1.14 Payment methods of hardship program customers	A retailer must report the number of hardship program customers who, in the relevant reporting period, use the following payment methods: <ul style="list-style-type: none"> • Payment plan (as defined in A.2.3.1) • Centrepay (as defined in A.2.2.1) • Prepayment meter (PPM) (as defined in A.5.1.1) • Any other payment method specified by the retailer. 	Quarterly	New reports will be required to be produced but it is our expectation that Country Energy can report on this category

