

Electricity Distribution Code customer service standards draft decision consultation - detailed summary of stakeholder feedback

Retailer obligations

Collecting and sharing customer contact information

Key stakeholder feedback summarised below.

Implementation and current practices

- Many retailers already collect comprehensive customer information, including email addresses and phone numbers (including mobile phone numbers) so our proposal should be relatively straightforward to implement.
- Some retailers routinely check customer contact information during phone interactions.
- Retailers already have automated systems in place to share information with distributors.
- One retailer suggested the language in the code drafting should align with the existing procedures.
- One retailer said that the requirement for phone numbers should be limited to two numbers only as this is all that can be accommodated in the Australian Energy Market Operator's existing business-to-business procedures.
- Some retailers did not consider that the monthly reconciliation process was needed when customer details are provided on a transaction by transaction basis.

Safeguarding customer details

- Retailers are comfortable to provide customer information to distributors if it is only used for the purposes of communicating with customers under the obligations in the Electricity Distribution Code.
- Some retailers queried what safeguards were in place for the use of customer information.

Other feedback

- One retailer highlighted that there may be some minor issues with this proposed obligation and a small number of old legacy contracts.
- One retailer queried if distributors must receive customer information within one business day.

- One retailer raised concerns about how the proposed requirements would work in practice as its customers are large electricity users or have large contracts that cover several sites and therefore do not easily fit within the proposed rules.

Applying Guaranteed Service Level (GSL) payments in a timely manner

Key stakeholder feedback summarised below.

Timely payments

- While retailers understand the problem the commission is trying to address and agreed that customers should receive timely payments, they considered applying payments within two business days would not be feasible for the majority of retailers.
- Most retailers said that additional time would be needed to apply payments due to the manual nature of the process.
- Payments are currently received through the monthly network settlement of bills from distributors, which are then manually identified and applied to customer accounts.
- Some larger retailers can receive thousands of payments to process for a single distributor's billing cycle, which itself can take time to process and apply to customer accounts.
- Some smaller retailers may only have one person to manage all network settlements and billing adjustments.
- One retailer wanted clarification of what the expectations were of retailers for updating customers billing following the application of a payment to a customer's account.

Reason for payments and customer enquiries

- Some retailers sought distributors to provide contextual information about payments such as the date or dates that resulted in a customer being eligible for a payment. They said this would help them manage customer enquiries (as customers often think that the payment is from their retailer, not their distributor).
- This was also supported by one customer representative group.

Distributor obligations

Planned outage communications

Key stakeholder feedback summarised below.

Overall

- Many stakeholders support modernising the ways distributors can communicate with their customers about planned outages. Some stakeholders said that greater emphasis should be placed on customer communication preferences.

- Some stakeholders said the proposed reforms are strong and sensible as they ensure distributors communicate with their customers about the planned interruption of an essential service in an efficient and effective way.
- One consumer advocate said that distributors should be able to collect customer information where a consumer contacts the distributor directly.
- Some stakeholders queried if we would create guidance around our expectations of what information should be provided to customers about planned outages or when outages are cancelled.
- One customer representative queried how distributors will treat a bounced email or text message notifications and whether an obligation to deal with this situation is needed.

Method of notification

- Distributors consider that notifying customers via one electronic channel is sufficient and that customer preferences should be considered.

Explicit informed consent

- Some distributors consider that the requirement to obtain explicit informed consent to notify customers through electronic only notifications is too onerous.
- Some distributors said that retailers should obtain explicit informed consent on behalf of the distributor. Conversely, some retailers and one consumer advocate said that this should be a distributor's responsibility.
- One distributor said that it thinks that the cost of obtaining explicit informed consent would be high. However, some retailers said that the cost would be offset by the savings and that costs should not be a driving factor as communicating with customers about planned outages are a distributor's core business function.
- Another retailer said explicit informed consent is a safeguard so that customers understand why the information is being collected and what it will be used for.
- One consumer peak body said that explicit informed consent was absolutely necessary regardless of who is collecting the consent to notify customers of planned supply outages.
- Conversely, another retailer said that the proposed explicit informed consent obligation is too onerous.

Notification when works are cancelled

- Some distributors said that notifying customers about cancelled outages within one hour may not be good customer service, for example, if the works were cancelled late at night.
- Another distributor said that cancelled works due to the declaration of a total fire ban day can happen late in the day.
- Some distributors asked for clarification about when they need to notify customers via electronic channels and hard copy notices, and how this interacts with notifying customers of cancelled works.

Guaranteed service level scheme

Key stakeholder feedback is summarised below.

Overall

- Consumer representatives said the revised scheme is well thought through and makes sense, and that including timely payments will address customer dissatisfaction.
- Distributors said clarification is needed for the momentary interruptions payment that it is capped at \$50 in total.
- Distributors also sought clarification regarding the automatic exclusion of all outages on major event days even when a customer does not reach the payment threshold of 12 hours.
- Distributors said that they think their initial and indicative modelling suggests there will be increases in the number of payments.

Timely payments and payment categories

- Some distributors indicated the 20 business day time frames for payment of late appointment and delayed new connection payments challenging and misaligns with the normal invoice scheduling of retailers once a month.
- Distributors sought clarity about the time frame for the delayed new connection payment to allow for greater flexibility so that connections could be made ahead of the agreed date where appropriate.
- Some distributors questioned whether the late appointment payment is still necessary now that smart meters have been rolled out to most Victorian premises.

Notifying local communities about testing bushfire safety equipment

Key stakeholder feedback is summarised below.

- Distributors were not supportive of the proposed requirement to publish notices in local or state newspapers and on websites before undertaking testing of bushfire safety equipment.
- Some distributors said that annual compliance testing was very unlikely to cause an outage and public notices may create an expectation that outages are likely to occur.
- Initial testing when the equipment is commissioned, is more likely to cause an outage and distributors already have community engagement plans in place for this.

Reporting

- We heard that there would be benefit from expanding the scope of reporting requirements for solar and battery connection time frames to also include electric vehicle connections.
- One stakeholder considered it would be useful for us to know how many customers have provided explicit informed consent to receive electronic only notifications.
- We also heard from consumer representatives that distributors should be required to report to us about the number of planned and unplanned outages.

Commencement of new framework

Key stakeholder feedback is summarised below.

Retailers

- Some retailers were comfortable with the proposed timeframes as our proposals integrated with existing processes and market procedures. However, some other retailers said they needed a longer implementation time frame to ensure full compliance.

Distributors

- Distributors said the Victorian Parliament is currently considering legislation that seeks to change the review of economic regulatory periods from calendar years to financial years starting from 1 July 2021 which directly interacts with our proposed reforms and their commencement.¹
- Some distributors said it would be difficult to implement the new rules by 1 January 2021 as system, process and reporting changes are needed.
- Most distributors said they currently have other IT projects underway to implement reforms by the Australian Energy Market Commission and Australian Energy Regulator.

¹ Victorian Parliament, National Energy Legislation Amendment Bill 2020, available at: <https://www.legislation.vic.gov.au/bills/national-energy-legislation-amendment-bill-2020>.