

10 September 2008

Review of Regulatory Instruments
Essential Services Commission
Level 2, 35 Spring Street
Melbourne Vic 3000
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ESC Review of Regulatory Instruments – Draft Decision August 2008

Envestra welcomes the opportunity to comment on the Commission's draft decision on its Review of Regulatory Instruments. The only comment we have relates to clause 4.3.1(a) of the paper, where the draft decision is that clause 4.2(o) of the Energy Retail Code "will be amended to require reference to the distributor against the faults and emergencies line number".

Firstly, Envestra believes that there may be different issues here in the context of gas versus electricity networks, as there are currently differences in where certain calls are directed for gas versus electricity networks. Notwithstanding this, Envestra does not support the Commission's decision to include the distributor's name on the consumer's bill for gas. Due to the identity of the legal entity that may own a network and the fact that the name or ownership can change over time, this may confuse consumers rather than improve matters. Also, the name of the distributor is not always relevant since the distributor usually outsources call centre operations to other entities. It is noted that Envestra's corporate office sometimes receives customer calls, a situation we do not wish exacerbated. Even if the name of the contracted call centre (in lieu of distributor) was printed on the bill, the name would have little relevance to the consumer and only serve to confuse customers.

Rather than adding the distributor's name, it needs to be made clearer on the bill that the emergency phone number does not pertain to the retailer, so that customers do not ring that number in the hope of contacting their retailer. Also, the term "faults and emergencies" may be misleading in the context of gas, as calls relating to supply faults are directed to the gas retailer, not the distributor.

Consequently, it is recommended that the following wording be used on gas retailers' bills:

"Billing, changing address, supply faults or other enquiries, phone [name of retailer] on XXXXXXXX"
"Gas leaks and emergencies only, phone network services provider on XXXXXXXX"

We believe the use of the words above will minimise misdirected calls. Should you or your staff wish to discuss any of the comments please feel free to contact me on ph (08) 8418 1128.

Yours sincerely
Ralph Mignone
Manager Engineering and Technical Regulation