

Mr Joe Dimasi
Senior Commissioner
Independent Competition and Regulatory Commission
PO Box 161
Civic Square ACT 2608

Via email: icrc@act.gov.au

Dear Mr Dimasi,

Issues Paper: Standing offer prices for the supply of electricity to small customers from 1 July 2020

Thank you for the opportunity to respond to the Issues Paper released as part of the ICRC Electricity Pricing Investigation 2020-2024.

The ACT Council of Social Service (ACTCOSS) has a particular interest in ensuring that the ICRC's decisions on pricing model and inputs and the transparency and comparability of electricity offers in the ACT include consideration of impacts on the affordability of energy for low-income households in the ACT and others at risk of experiencing hardship.

In February 2019, we provided a [response to the ICRC Review of Electricity Price Method and Model](#) and our Senior Policy Officer, Geoff Buchanan, attended the ICRC workshop on the transparency and comparability of electricity offers on 25 September 2019.

We welcome the attention that the Issues Paper gives to transparency and comparability of electricity offers in the ACT. We see potential benefits in building on the strengths of existing regulatory arrangements in the ACT and drawing on the strengths of the Default Market Offer (DMO) and Victorian Default Offer (VDO) arrangements. This includes exploring the potential benefits of the 'best offer', 'bill change notice', and 'clear advice entitlement' arrangements under the VDO.

Further dialogue between the ICRC and the community sector – especially financial counsellors and emergency relief providers – would be extremely valuable in order to develop a well-informed response to the questions raised in the issues paper.

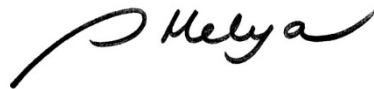
In developing the draft report and proposed price direction by February 2020, we recommend that the ICRC undertake further

engagement with ACTCOSS and community service providers (including financial counsellors and emergency relief providers) in order to address the questions raised in the Issues Paper. This would be particularly valuable given the significance and complexity of some of the issues raised and decisions to be made.

ACTCOSS would welcome the opportunity to work with the ICRC to facilitate such a dialogue to ensure that the draft and final report and price direction are adequately informed by the needs of those most at risk of energy hardship in the ACT.

If you would like to discuss our recommendation for further dialogue to inform the draft report and proposed price direction please don't hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Helyar', with a large, sweeping initial 'S'.

Susan Helyar
CEO



17 October 2019