

Consumer Protection Code Review - information request automatic payment of rebates

1. Evoenergy's views on which aspects of the National Legislation that set out the relationship management between NERL Retailers and DNSP's, in particular in relation to the payment of GSL payments to customers, that is ambiguous or would be problematic to implement.

Evoenergy suggests clarification of the application of GST be addressed in the legislation or applicable code. In addition, clarity surrounding the entity who is the source of the breach being accountable for the automatic payment is sought.

Evoenergy does not believe relationship management between NERL Retailers and DNSP's as set out in the National Legislation will be problematic to implement. Evoenergy does note implementation of GSL payments through NERL retailers has dependencies, including system and process changes, and communication and acceptance of these changes with NERL retailers.

Evoenergy is unable to comment on NERL retailer's view of this matter.

Evoenergy notes a requirement for payment of all GSL payments via a NERL retailer does not provide affected customers an opportunity to elect a preferred alternative payment method e.g.: bank transfer. Evoenergy suggests the ICRC consider an inclusion permitting an agreed alternative payment method.

2. Evoenergy's views on whether alternative automatic GSL models (such as those in the QLD or SA Codes) would be more practical or appropriate for the ACT, rather than the model spelt out in the National Legislation.

Noting technical, system and process change requirements for both Evoenergy and NERL Retailers, Evoenergy confirms a preference for an agreed alternative method of payment other than via a NERL retailer to be permissible as per Queensland's Electricity Distribution Network Code (2.3.12).

Evoenergy asserts any automatic payment of GSL's exclude scenarios including (*noting this list is not exhaustive*), interruptions caused by customer's equipment, interruptions at AEMO's or Emergency Service's direction, load shedding, momentary interruptions, transmission related interruptions, extreme events (e.g.: bushfire) and declared major event days (MED's).

3. Evoenergy's current system capabilities to proactively identify customers (or properties) where the minimum standards have not been met.

Regarding current minimum standards, current system capabilities do not provide proactive identification of sites (or customers). Evoenergy's systems do contain the necessary information, in most instances, to reactively identify affected premises

Reporting to utilise this information proactively would require development and testing.

Evoenergy notes there may be instances where minimum service standards are not met and are not able to be proactively identified by Evoenergy via automated system detection. Evoenergy references and supports the consideration of provisions used in other jurisdictions (e.g.: QLD) for small customers to claim a GSL where entitlement for a payment has not been automatically detected and paid.

Evoenergy cannot comment on system capabilities for minimum standards that are as yet unknown.

4. Potential costs, system changes and implementation timeframes required to enact automatic payments; both through NERL retailers, as outlined in the National legislation, or through alternative models.

Detailing of potential system and process changes including costs and timeframes is not available within the timeframe provided.

Evoenergy is unable to comment on NERL retailer's requirements and timeframes.

5. Any alternative proposals that Evoenergy may have to ensure that customers receive rebates in recognition of Evoenergy not meeting the minimum service standard.

Evoenergy offers an 'every customer' model as an alternative to the 'affected customer' model.

This model would involve a payment based on historical rebates by way of a Network Use of System (NUOS) charge reduction, on a 'same amount for each residential customer basis'. It would be mandatory for NERL retailer's to pass on this rebate via the customers' invoice. This model would not require the level of system and process changes as the proactive, affected customer model does.

The penalty amount dispersed across customers would be adjusted annually based on previous year reporting of performance against minimum standard targets.