



HPRM NO: JED2017/84089

18 August 2017

Mr Justin Martyn
Director
Utilities Commission
GPO Box 915 Darwin NT 0801

Dear Mr Martyn,

RE: Utilities Commission Review of the Electricity Service Standards and Guaranteed Service Level Codes

Jacana Energy appreciates this opportunity to provide a brief submission on the Utilities Commission's (UC) draft Electricity Industry Performance Code (EIPC).

We consider the new reporting framework under the EIPC is a step forward for the Northern Territory as it significantly improves the clarity of existing reporting requirements and increases consistency with the national framework. Uniform national reporting obligations lowers barriers to retailers operating across state and territory boundaries and thereby supports a competitive retail market in the Northern Territory. It also allows Jacana Energy to benchmark its performance against that of other retailers in the national market, which should encourage good performance from our customer service team.

There are two specific issues Jacana Energy would like to raise with the UC regarding the EIPC.

First, the majority of our Pre-Payment Meters (PPMs) are accumulation meters which cannot be read either remotely or on an interval basis. This means Jacana Energy is unable to collect information on the performance measures the UC has proposed for customers on PPMs. We understand that Power and Water intends to replace the existing stock of PPMs with smart PPMs, so in time this situation will change. In the mean-time however, these performance measures will need to recognise Jacana Energy's data collection limitations. We suggest the proposed performance measures are amended to clearly specify they relate only to PPMs capable of reporting on self-disconnections.

Second, we note that the UC has removed the distinction between Urban and Rural feeders with respect to guaranteed service levels. The same shorter connection timeframes - 5 days for a new connections and 24 hours for a reconnection - now apply for both urban and rural customers. We are concerned the new time frames may not be realistic for rural customers, which could lead to an unreasonable level of GSL payments being paid out by Power and Water.

For example, it takes a lot longer to connect or reconnect a customer at Dundee or Timber Creek than it does in Darwin, which suggests a different performance metric is likely to be appropriate. We note that the guaranteed service level that applies to Ergon Energy with respect to both new connections and reconnections on long rural areas is 10 business days, the same as Power and

Water's current standard. Jacana Energy considers different connection timeframes for rural and urban customers with respect to GSL payments is likely to be warranted.

However, Jacana Energy considers that in return for reducing the stringency of connection service standards for rural customers, the UC should require Power and Water to commit to extending the time frame for its business hours reconnection charge. Power and Water deems any request for reconnection after 3pm to trigger its 'after business hours' reconnection charge, which is 5 times greater than the standard charge. In Jacana Energy's view the 3 pm cut-off is highly problematic, since it is not consistent with community perceptions of what constitutes normal business hours and we find this is leading to significant ongoing complaints.

If you have any questions please do not hesitate to contact Con Van Kemenade on 0439399943 or myself.

Yours sincerely,



William Oliver

General Counsel & Company Secretary
Jacana Energy