Submission in response to the Utilities Commission of the Northern Territory's Review of the Electricity Industry Performance Code – Consultation paper

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#### Introduction

We acknowledge the Utilities Commission of the Northern Territory (**Commission**) for this opportunity to contribute to the latest review of the Electricity Industry Performance Code (**review and EIP Code**, respectively). As stated in the Commission's consultation paper (**consultation paper**), the purpose of the current review is to "address identified issues, incorporate feedback from stakeholders as considered appropriate and ensure that the EIP Code is effective and relevant".

As members of a larger academic research team who have undertaken peer-reviewed studies on the prevalence and impacts of residential energy (in)security in First Nations communities in the Territory, we are pleased to be able to contribute to this process and our submission is broadly informed by our research. Our submission addresses the following aspects of the review:

- 1. Principles for consideration of exemptions and extension requests
- 2. Reporting requirements
- 3. Schedule 4: Retail services performance indicators
- 4. Retail performance reporting requirements for remote communities which we raise as critical for the iterative improvement, and ongoing effectiveness and relevance, of the EIP Code.

1. Principles for consideration of exemption and extension requests

# 1.1 Background

Clause 5.1.3 of the EIP Code enables licensees to apply for an exemption or an extension for reporting requirements. The Commission proposes to specify the principles or assessment criteria to apply when it considers a request for an exemption, such as public interest, compliance integrity, proportionality and temporariness. The purpose, as stated in the consultation paper is "to make it clear an exemption request will not be simply approved".

The Commission has asked:

Question 2: Is the current reporting exemption provision under clause 5.1.3 of the EIP Code appropriate for licensees in terms of ensuring EIP Code reporting compliance? Why or why not?

# 1.2 Submission

Our view is that the addition of assessment criteria to guide the Commission's consideration of an exemption request under clause 5.1.3 would improve the operation of the EIP Code. We support the inclusion of the listed criteria, namely public interest, compliance integrity, proportionality and temporariness. We recommend the starting point is naturally an expectation for compliance – with exemptions to be granted in exceptional cases only.

Additionally, it would be valuable for the Commission to clarify whether the same criteria would explicitly apply in considering an extension request, or whether that type of request would be assessed according to different factors.

Our view is that the addition of the stated critera would support procedural fairness and transparency in the operation of this provision. Given that the provision covers both exemptions and extensions, we consider it appropriate to apply the same criteria to each type of request.

Further, and again in the interests of transparency, we recommend an amendment to this part of the EIP Code to establish public notification requirements for the following:

- (a) any exemption approval; and/or
- (b) an extension approval which would materially impact the Commission's own public reporting obligations for example, the annual Electricity Retail Review.

To support accountability, any significant exceptions to the reporting obligations in the EIP Code should be publicly notified, together with the Commission's reasons for the decision.

## 2. Reporting requirements

## 2.1 Background

The Commission observes that historical data, required as part of annual licensee reports, is often reported differently to data for the most recent reporting year e.g., historical data is grouped annually while latest data is presented quarterly in accordance with EIP Code requirements. The Commission notes that:

Ensuring that both historical data and the reporting period data are segmented consistently will provide a more detailed and accurate picture of performance trends over time. This will facilitate easier comparison and analysis, enabling the licenced entities and the Commission to identify patterns, anomalies, and areas requiring attention more effectively.

On this basis, the Commission asks:

Question 5 Should the EIP Code be more explicit in requiring historical data to be segmented in the same manner as the reporting period data? Why or why not?

## 2.2 Submission

We support amendments to achieve reporting consistency between historical and current reporting period data for the reasons identified by the Commission above. This approach will ensure the internal consistency of the performance reporting dataset and potentially enable improved insights to inform remedial policymaking where required.

## 3. Schedule 4: Retail services performance indicators

## 3.1 Background

The Commission observes that at the time of preparing the consultation paper, the AER was in the process of updating its own Performance Reporting Procedures and Guidelines (**Guidelines**) and that changes made to reporting requirements in the national context could necessitate updates in the Territory.

Subsequently, the AER has released its final decision on the Guidelines and the changes to the national reporting requirements have been made publicly available.<sup>1</sup> The new AER reporting standards come into effect on 1 July 2025.

The Commission asks:

Question 21: How might the proposed changes to the AER's performance reporting procedures and guidelines impact stakeholders' associated operations and reporting under the EIP Code?

<sup>&</sup>lt;sup>1</sup> AER (Retail Law) Performance Reporting Procedures and Guidelines, available at <u>https://www.aer.gov.au/system/files/2024-</u>

<sup>08/</sup>AER%20%28Retail%20Law%29%20Performance%20reporting%20procedures%20and%20Guidelines %20-%20Version%204%20-%2028%20August%202024.pdf.

# 3.2 Submission

Our view is that AER's Guidelines should be used to inform reporting updates under the EIP Code across a range of metrics, including in respect of:

- Family violence protections
- Hardship program indicators
- Life support customers
- Prepayment meter customers.

We address each of these below.

## 3.2.1 Family violence protections

The Northern Territory Electricity Retail Supply Code (**ERS Code**) was updated to include family violence protections effective from 1 July 2023. There are currently no performance indicators corresponding to those protections.

We support the inclusion of performance indicators pertaining to family violence in the EIP Code to enable monitoring of and transparency around the new protections contained in the ERS Code.

The AER's updated Guidelines includes four (4) new performance indicators for customers affected by family violence, which we think have relevance to and can be directly adopted in the Northern Territory context, specifically:

S6.12. Number of affected customers

S6.13. Number of affected customers added to a retailer's system

- S6.14. Number of affected customers on a payment plan
- S6.15. Number of affected customers on a retailer's hardship program.<sup>2</sup>

Additionally, we recommend that the 'number of affected customers' and 'number of affected customers added to a retailer's system' should be reported according to numbers of post-payment customers and numbers of prepayment customers in each category. This is based on the unique prevalence of prepayment in the Territory, to enable a better understanding of how households affected by family violence are accessing the supports available to them according to meter and/or payment type.

# 3.2.2 Hardship program indicators

The ERS Code was also updated from 1 July 2023 to require retailers to comply with an approved customer hardship policy for residential customers that meets minimum

<sup>&</sup>lt;sup>2</sup> AER (Retail Law) Performance Reporting Procedures and Guidelines, Schedule 6, p 62, available at <u>https://www.aer.gov.au/system/files/2024-</u>

<sup>08/</sup>AER%20%28Retail%20Law%29%20Performance%20reporting%20procedures%20and%20Guidelines %20-%20Version%204%20-%2028%20August%202024.pdf.

requirements for standard meter customers (clause 12.1.6) and prepayment meter customers (clause 13.1.7), respectively.

While the EIP Code already contains several performance indicators relating to hardship, the payment methods of hardship program customers are not currently reported on by retailers.<sup>3</sup> This is an important indicator to consider given that hardship policies are now required to serve the needs of both post-pay and prepayment customers.

The AER's Guidelines include S4.9. *Payment methods of hardship program*, requiring retailers to report the total number of hardship program customers making payments using specified payment methods during the reporting period, including:

- a) Payment plan (excluding those who make their payment plan payments using Centrepay)
- b) Centrepay
- c) Prepayment meter (PPM)
- d) Australia Post
- e) Direct debit
- f) Any other payment method.

We support the inclusion of this indicator in the EIP Code, noting that the available payment types may need to be adjusted to suit Territory retailers' permitted payment methods. The addition of this reporting requirement would appropriately reflect the updates to the ERS Code and enable a better understanding of how households experiencing hardship are accessing available supports by meter and/or payment type.

The indicators that are currently available suggest that prepayment households face significant hardship in meeting their energy needs. This is evident in the high frequency and duration of prepayment meter disconnections, which are reported on for households in the major networks.

In 2022-23, prepayment households located in the major networks experienced on average 42.8 disconnections per year, for an average duration of 5.92 hours (i.e., 355 mins).<sup>4</sup> While the Commission cautions against reliance upon self-disconnections data, for example as a direct indicator of hardship, it also acknowledges that use of prepayment meters is common amongst those managing payment difficulties and hardship.<sup>5</sup>

<sup>&</sup>lt;sup>3</sup> Utilities Commission, Northern Territory Electricity Industry Performance Code, Schedule 4: Retail Services Performance Indicators, pp. 35-36.

<sup>&</sup>lt;sup>4</sup> Utilities Commission of the Northern Territory, Northern Territory Electricity Retail Review 2022-23, p. 32, available at <a href="https://utilicom.nt.gov.au/\_\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf">https://utilicom.nt.gov.au/\_\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf</a>.

<sup>&</sup>lt;sup>5</sup> As above.

Further, when the EIP Code was being developed the Commission observed that prepayment customer indicators were important additions to retail reporting requirements in the Territory considering that:

Prepayment meters are generally used by struggling customers. We have special prices within the pricing order for pre-paid meters, therefore [it is] important to have an understanding of how many there are, and how these customers are travelling.<sup>6</sup>

We agree and are of the view that the inclusion of a new retail performance indicator for the total number of hardship program customers by payment type could assist in better understanding both the circumstances of prepayment households and whether retailers' hardship policies and practices enable those in need to access appropriate supports.

## 3.2.3 Life support customers

We observe that the AER includes three (3) performance indicators for life support customers in its Guideline. They are:

S6.9. Number of life support customers – with medical confirmation and without medical confirmation

S6.10. Number of life support customers registered

S6.11. Number of life support customers deregistered.<sup>7</sup>

In the EIP Code, there are currently no performance reporting metrics relating to life support protections.

We recommend that these AER performance indicators are adopted in the EIP Code to enable a better understanding of how life support protections are operating in the Territory context. The addition of a fourth indicator 'number of prepayment meter customers switched to post payment due to life support requirements' is also recommended to enable transparency about the protections and procedures contained in clause 10.6 of the ERS Code.

## 3.2.4 Prepayment meter customers

In 2023, the Commission undertook a review of the EIP Code addressing standards of service and guaranteed service levels (**2023 review**). In this context, the issue of reporting prepayment meter indicators by region across the major networks of Darwin, Katherine, Tennant Creek and Alice Springs was considered.

<sup>&</sup>lt;sup>6</sup> Utilities Commission of the Northern Territory, Proposed Electricity Industry Performance Code, July 2017, p. 29, available at < https://utilicom.nt.gov.au/publications/codes-and-guidelines/proposed-code-standards-of-service-and-guaranteed-service-levels>.

<sup>&</sup>lt;sup>7</sup> As above, pp. 60-61.

In its final decision, the Commission decided to maintain the requirement for retailers to segment data by region for prepayment meter performance indicators in the major networks.<sup>8</sup> In making this decision, the Commission observed:

While the Commission does not generally use the lower level regional retail performance data to perform its functions, the Commission has noted in its public reports that historical and comprehensive data relating to pre-payment meters in the Territory is limited. Further, feedback from ANU researchers regarding the Commission's Electricity Retail Supply Code review is that retailers should monitor and report more data on pre-payment meters. As such, the Commission considers, at least for now, that regional segmentation should still be required for pre-payment meters.<sup>9</sup>

We note that prepayment household data was subsequently publicly reported at the regional level in the Northern Territory Electricity Retail Review 2022-23.<sup>10</sup> We support the continuance of this more granular reporting approach for prepayment indicators, both as a requirement for licensees and as a publicly available dataset that could foreseeably enable insights about the impacts of prepayment across different geographical regions and climate zones in the Territory, and across the jurisdictions where prepay is used in Australia.

Further, we note that the AER Guidelines include additional indicators relating to prepayment meter customers that are not reported on in the Territory,<sup>11</sup> and we recommend the EIP Code is updated to reflect these:

## S3.29. Total number of PPM customers

This indicator includes all prepayment meters, not just those capable of detecting and reporting self-disconnections. It is reported on by the Commission in the Northern Territory Electricity Retail Review 2022-23 but not included as a discrete performance indictor in the EIP Code, which should be corrected.

## S3.30. Number of PPM customers that receive an energy concession

This indicator would provide policymakers and community organisations with a better understanding of whether eligible prepay households are accessing

<sup>&</sup>lt;sup>8</sup> Utilities Commission of the Northern Territory, Electricity Industry Performance Code (Standards of Service and Guaranteed Service Levels) Review: Final Decision Paper dated 8 June 2023, pp. 27-28, available at <a href="https://utilicom.nt.gov.au/\_data/assets/pdf\_file/0008/1240883/Final-Decision-Electricity-Industry-Performance-Code-Review.pdf">https://utilicom.nt.gov.au/\_data/assets/pdf\_file/0008/1240883/Final-Decision-Electricity-Industry-Performance-Code-Review.pdf</a>.

<sup>&</sup>lt;sup>9</sup> As above, p. 27.

<sup>&</sup>lt;sup>10</sup> Utilities Commission of the Northern Territory, Northern Territory Electricity Retail Review 2022-23, p. 33, available at <a href="https://utilicom.nt.gov.au/\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf">https://utilicom.nt.gov.au/\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf</a>.

<sup>&</sup>lt;sup>11</sup> AER (Retail Law) Performance Reporting Procedures and Guidelines, Schedule 3, pp. 35-38, available at <u>https://www.aer.gov.au/system/files/2024-</u>

<sup>08/</sup>AER%20%28Retail%20Law%29%20Performance%20reporting%20procedures%20and%20Guidelines %20-%20Version%204%20-%2028%20August%202024.pdf.

available energy concessions and enable improvements in access where necessary.

## S3.31. Number of PPMs removed due to payment difficulties

While there is no codified process in the Territory for switching from a prepayment meter to a post-payment arrangement due to payment difficulties, we believe this indicator is worth tracking given that retailers must have a hardship policy for their prepayment customers (ERS Code, clause 13) and switching from prepayment to post-payment is foreseeably an option available to customers experiencing payment difficulties to avoid the risk of prepayment meter self-disconnections.

We also request that the Commission includes current and historic data for 'Total number of PPM customers self-disconnected' in its future public reporting. This indicator is already part of licensee reporting requirements under the EIP Code,<sup>12</sup> yet has not been included in the Commission's public reporting through its annual Electricity Retail Review to date.<sup>13</sup> The omission is significant because this indicator provides an understanding of the proportion of prepayment households experiencing disconnections. It is in the interests of transparency that all performance indicators reported on by licensees also form part of the publicly available dataset.

# 4. Remote communities reporting

In our submission to the 2023 review, we recommended performance reporting under the EIP Code be extended Territory-wide – specifically to include the 72 remote Indigenous communities and associated outstations where Power and Water Corporation (**PWC**) is the licensed retailer operating through its not-for-profit subsidiary Indigenous Essential Services (**IES**).<sup>14</sup>

Currently, no public reporting occurs for provision of electricity services in these remote Indigenous communities which rely on isolated networks for their electricity supply. This absence of reporting extends to all previously mentioned retail performance indicators, including the number of customers, how customers pay for electricity (prepayment or post-payment), and how often and for how long household disconnections from electricity supply occur.

These retail indicators are publicly reported for residential customers in the Territory across the major centres of Darwin, Katherine, Tennant Creek and Alice Springs, and more broadly for customers across Australia. Effectively half of all public housing residents in the Territory, and all remote Indigenous communities prepay for electricity services. Prior research has shown that self-disconnections due to lack of credit on the

<sup>&</sup>lt;sup>12</sup> Utilities Commission, Northern Territory Electricity Industry Performance Code, Schedule 4: Retail Services Performance Indicators, p. 35.

<sup>&</sup>lt;sup>13</sup> Utilities Commission of the Northern Territory, Northern Territory Electricity Retail Review 2022-23, p. 32, available at <a href="https://utilicom.nt.gov.au/\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf">https://utilicom.nt.gov.au/\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf</a>.

<sup>&</sup>lt;sup>14</sup> ANU, Submission in response to Utilities Commission of the Northern Territory's Electricity Industry Performance Code (Standards of Service and Guaranteed Service Levels) Review – Draft Decision Paper (17 February 2023) dated 30 March 2023.

meter are commonplace due to systemic factors that include economic inequalities, high rates of income poverty, high energy costs, poorly performing social housing and an extreme climate.<sup>15</sup>

The current lack of public reporting limits what is known about the impacts of prepayment, and the present and future impacts of energy insecurity for remote living households. In its final decision for the 2023 review, the Commission acknowledged:

the concerns raised in the ANU researchers' submission regarding disparities in reporting requirements, and subsequent public visibility of potential issues and performance in the Territory between access-regulated networks and isolated or remote networks, such as those serviced by government- owned PWC's not-for-profit subsidiary IES.<sup>16</sup>

The Commission considered there were different regulatory (or policy) practices in place between major and isolated networks in the Territory and consequently decided to raise the matters in our submission with the Territory Government rather than make a direct determination on the matter of remote reporting.

Since then, significant changes have been made to improve consumer protections for electricity customers in the Territory, both in the context of the ERS Code and through legislative processes. As noted previously, the Commission introduced hardship and family violence protections in the ERS Code effective from 1 July 2023, which apply Territory-wide. The new hardship and family violence protections complement previous consumer protections for life support customers included in the ERS Code from 2019.

Further, the Territory Government has enacted amendments to the *Electricity Reform Act 2000* (NT) (**ER Act**) empowering the Commission to implement a consumer protection framework including "measures to regulate electricity entities that own or operate an electricity network or sell electricity, to protect the interests of customers, including in relation to the following: (a) continuity of supply; (b) the needs of particular types of retail customers; (c) disputes."<sup>17</sup>

The Commission in the Northern Territory Electricity Retail Review 2022-23 states that:

the Territory Government passed the Electricity Legislation Amendment Act 2023 in October 2023, which strengthens requirements in the ERS Code. The Commission is continuing to work with Office of Sustainable Energy in the

<sup>&</sup>lt;sup>15</sup> Longden, T. et al. (2022) Energy insecurity during temperature extremes in remote Australia. *Nature energy*. [Online] 7 (1), 43–54.

<sup>&</sup>lt;sup>16</sup> Utilities Commission of the Northern Territory, Electricity Industry Performance Code (Standards of Service and Guaranteed Service Levels) Review: Final Decision Paper dated 8 June 2023 available at < <a href="https://utilicom.nt.gov.au/\_\_\_data/assets/pdf\_file/0008/1240883/Final-Decision-Electricity-Industry-Performance-Code-Review.pdf">https://utilicom.nt.gov.au/\_\_data/assets/pdf\_file/0008/1240883/Final-Decision-Electricity-Industry-Performance-Code-Review.pdf</a>>.

<sup>&</sup>lt;sup>17</sup> Electricity Legislation Amendment Act 2023 (NT).

development of a fit-for-purpose electricity customer protection framework in the Territory and will make further changes to its ERS Code to achieve this end.<sup>18</sup>

The regulatory framework which applies to the electricity industry is unique to the Territory, characterised by the separation of generation, network and retail activities in major networks yet the combined provision of these services by one licensed entity (PWC) in remote communities.

The principal legislation regulating the electricity industry is the ER Act, which confers upon the Commission "licensing, price regulation and other functions and powers".<sup>19</sup> Alongside this, in major networks of Darwin, Katherine, Tennant Creek and Alice Springs, electricity rules apply to market operations and network services under the *National Electricity (Northern Territory) (National Uniform Legislation) Act 2015 (NT),* overseen by AEMO and the AER.

In the major networks, government-owned Territory Generation is the primary generator operating within a competitive, open access framework; a distinct division of PWC provides system control services; PWC provides network services; and retail services are provided by government-owned Jacana Energy within a competitive framework. The original iterations of the ERS Code (2011) and EIP Code (2017) functioned to support the activities of licensees in the major networks.

In remote Indigenous communities, PWC is the sole licensed generator and network provider as well as the sole licensed retailer operating through its subsidiary IES. Retail service provision occurs pursuant to a contract between the Territory Government and IES, the terms of which are not publicly available.<sup>20</sup>

While these network-based distinctions certainly have relevance in particular contexts, the regulatory environment of the Territory is undergoing a process of change including the strengthening of retail consumer protections uniformly across major networks and remote communities.

This shift is reflected in the changes to the ERS Code from 2019 onwards which have seen the introduction of consumer-oriented provisions applying Territory-wide. The remedial work underway is bolstered by the Territory Government's amendments to the ER Act, supporting the Commission's ongoing work in developing and strengthening consumer protections appropriate for the Territory's small use electricity customers.

<sup>&</sup>lt;sup>18</sup> Utilities Commission of the Northern Territory, Northern Territory Electricity Retail Review 2022-23, p. 34, available at <a href="https://utilicom.nt.gov.au/\_\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf">https://utilicom.nt.gov.au/\_\_data/assets/pdf\_file/0005/1375268/NT-Electricity-Retail-Review-2022-23.pdf</a>.

<sup>&</sup>lt;sup>19</sup> ER Act, s 6(a).

<sup>&</sup>lt;sup>20</sup> See for example, Utilities Commission of the Northern Territory, Electricity Industry Performance Code (Standards of Service and Guaranteed Service Levels) Review: Final Decision dated 8 June 2023, p. 5, available at <a href="https://utilicom.nt.gov.au/\_\_\_data/assets/pdf\_file/0008/1240883/Final-Decision-Electricity-Industry-Performance-Code-Review.pdf">https://utilicom.nt.gov.au/\_\_data/assets/pdf\_file/0008/1240883/Final-Decision-Electricity-Industry-Performance-Code-Review.pdf</a>.

In this context, we restate our recommendation that the retail performance reporting requirements in the EIP Code should apply Territory-wide, including for remote Indigenous communities.

In support of this recommendation, we make the following points:

 Firstly, the Commission last considered the issue of remote performance reporting in June 2023. This was before the Territory Government initiated amendments to the ER Act in October 2023, providing a legislative basis for consumer protections for electricity customers applicable Territory-wide. It was also prior to the commencement of Commission-initiated amendments to the ERS Code introducing hardship and family violence protections that apply to customers in both major centres and remote communities.

Consumer protections are intended to apply equally across the different networks in the Territory; public reporting on the performance of those retailers providing electricity services and associated protections should likewise apply in both contexts. Over time, the scope and focus of the ERS Code has shifted to include a focus on electricity entities operating in remote communities as well as major centres through life support, hardship and family violence protections. The retail performance indicators and reporting requirements contained in the EIP Code should be extended accordingly.

2. The Commission's view that the type of network (major and access-regulated versus remote and isolated) should guide whether retail reporting requirements are applicable lacks foundation, for the following reason.

The differentiation of networks as being access-regulated or not is concerned with *network service provision*, whereas the reporting in question is focused on *retail performance*. The importance of retail performance reporting stands irrespective of what type of network arrangements are applicable by location.

While the distinction made between networks is relevant for the purposes of the AER's economic regulation of network services under the <u>National Electricity</u> (<u>Northern Territory</u>) (<u>National Uniform Legislation</u>) Act 2015 (NT), this in no way circumscribes the Commission's regulatory activities or remit in relation to consumer protections for retail customers and retail reporting requirements with which the Commission has been tasked.

- 3. This informs our view is that there is no legislative basis for upholding differential reporting requirements between major centres and remote communities. The Territory Government's intention for electricity consumer protections to apply equally across the Territory is evident in the ER Act it follows that the reporting obligations of retail entities involved in the provision of those services and associated protections are also applicable on a uniform basis.
- 4. The Commission's power to make a code that contains performance indicators for standards of service derives from the combined effect of the ER Act, the

*Utilities Commission Act 2000* (NT) and the Utilities Commission Regulations 2001, reg 2B which provides:

- (1) The Utilities Commission is authorised to make a code relating to standards of service by **licensed entities** in the **electricity supply** *industry*.
- (2) Without limiting subregulation (1), a code may deal with the following:
  - (a) standards of service by licensed entities in the electricity supply industry;
  - (b) performance measures for standards of service by licensed entities in the electricity supply industry;
  - (c) payments to certain customers if specified standards of service are not met.

The regulations adopt the inclusive language of the ER Act; they do not specify any authority to exclude certain licensed entities from the operation of standards of service and performance measures, or to limit them to particular networks.

5. Furthermore, the extensive rollout of smart metering in remote communities now makes it possible for PWC to report on the same metrics that apply to retailers in major centres. In fact, in its hardship policy which applies to remote Indigenous communities where IES is the retailer, PWC states that one way it identifies hardship for prepayment customers is:

Through our daily reporting of prepayment meter systems, disconnections and reconnections.<sup>21</sup>

PWC acknowledges it is already collecting internal data relevant to the necessary retail performance indicators, thus demonstrating the feasibility of public reporting for households in remote Indigenous communities. Essentially, the limitations on required reporting are no longer technical and instead have a political basis.

Recently, PWC provided Tangentyere Council with data showing the number of prepayment meters by remote community to support improved transparency around remote services (see **Annexure 1**).

Expanded reporting requirements under the EIP Code would enable further insights about the energy needs of remote households, who have long been overlooked in public reporting. Foreseeably, remote performance reporting could do much to improve the position of local community-controlled organisations with respect to:

<sup>&</sup>lt;sup>21</sup> PWC, Customer Hardship Policy, approved by the Commission on 14 March 2024, available at <u>https://www.powerwater.com.au/customer-hardship-policy/home</u>.

- Closing on the Gap priority reforms 1 through 4, including shared decision making, building the community-controlled sector, transforming government organizations and shared access to data at a regional level; and
- The upcoming Remote Power Systems Strategy (NT) and the First Nations Clean Energy Strategy undertaken by the Department of Climate Change, Energy the Environment and Water.

We encourage the Commission to revisit the application of retail performance reporting under the EIP Code in the context of regulatory changes underway. Changes to include public reporting requirements for remote communities would contribute to ensuring the ongoing relevancy and effectiveness of the EIP Code.

We would be pleased to discuss any aspects of this submission.

Annexure 1 – NT remote prepayment meters (October 2024)

### Northern Territory Remote Prepayment Meters by Community

FFA #	FFA Footprint Communities	TFHC Region	PowerWater Region	Land Council	OC-OF-OH 30 June 2024	Total Number of Prepayment Meters	Number of Prepayment Meters Capable of Reporting Self-Disconnection
1	Acacia Larrakia	Arafura	Darwin	NLC	14	12	0
2	Ali Curung	Barkly	Southern	CLC	75	81	81
3	Alpurrurulam	Barkly	Southern	CLC	81	81	0
4	Amanbidji	Big Rivers	Katherine	NLC	19	24	0
5	Amoonguna	Central	Southern	CLC	57	54	54
6	Ampilatwatja	Barkly	Southern	CLC	45	45	0
7	Angurugu	Arnhem	Darwin	ALC	159	0	0
8	Apatula (Finke)	Central	Southern	CLC	52	44	0
9	Areyonga	Central	Southern	CLC	33	35	0
10	Atitjere	Central	Southern	CLC	30	31	0
11	Barunga	Big Rivers	Katherine	NLC	77	89	89
12	Belyuen	Arafura	Darwin	NLC	48	44	0
13	Beswick	Big Rivers	Katherine	NLC	94	100	100
14	Binjari	Big Rivers	Katherine	NLC	44	45	45
15	Bulla	Big Rivers	Katherine	NLC	25	27	27
16	Bulman-Weemol	Big Rivers	Darwin	NLC	46	45	45
17	Canteen Creek	Barkly	Southern	CLC	26	29	0
18	Daguragu	Big Rivers	Katherine	CLC	45	46	46
19	Engawala	Central	Southern	CLC	23	26	0
20	Epenerra	Barkly	Southern	CLC	31	33	0
21	Galiwinku	Arnhem	Darwin	NLC	271	309	309
22	Gapuwiyak	Arnhem	Darwin	NLC	135	135	135
23	Gunbalanya	Arafura	Darwin	NLC	195	201	201
24	Gunyangara	Arnhem	Darwin	NLC	33	59	59
25	Haasts Bluff	Central	Southern	CLC	16	26	0
26	Hermannsburg	Central	Southern	CLC	133	134	134
27	Imangara	Barkly	Southern	CLC	18	15	0
28	Imanpa	Central	Southern	CLC	29	26	0
29	Jilkminggan	Big Rivers	Katherine	NLC	39	36	0
30	Kalkarindji	Big Rivers	Katherine	CLC	67	68	68
31	Kaltukatjara	Central	Southern	CLC	50	52	0

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FFA #	FFA Footprint Communities	TFHC Region	PowerWater Region	Land Council	OC-OF-OH 30 June 2024	Total Number of Prepayment Meters	Number of Prepayment Meters Capable of Reporting Self-Disconnection
32	Kintore	Central	Southern	CLC	69	65	0
33	Kybrook Farm	Big Rivers	Darwin	NLC	13	14	14
34	Lajamanu	Big Rivers	Katherine	CLC	94	103	103
35	Laramba	Central	Southern	CLC	39	44	0
36	Maningrida	Arafura	Darwin	NLC	329	328	328
37	Manyallaluk	Big Rivers	Katherine	NLC	19	16	16
38	Milikapiti	Arafura	Darwin	TLC	111	119	119
39	Milingimbi	Arnhem	Darwin	NLC	116	129	129
40	Milkyakburra	Arnhem	Darwin	ALC	29	0	0
41	Minjilang	Arafura	Darwin	NLC	43	41	41
42	Minyerri	Big Rivers	Katherine	NLC	59	57	0
43	Mount Liebig	Central	Southern	CLC	29	27	0
44	Mutitjulu	Central	Southern	CLC	38	0	0
45	Nauiyu	Arafura	Darwin	NLC	72	86	86
46	Nganmarriyanga	Arafura	Darwin	NLC	50	53	53
47	Ngukurr	Big Rivers	Katherine	NLC	158	160	160
48	Nturiya	Central	Southern	CLC	23	34	0
49	Numbulwar	Big Rivers	Darwin	NLC	122	125	125
50	Nyirripi	Central	Southern	CLC	43	45	0
51	Papunya	Central	Southern	CLC	51	71	65
52	Peppimenarti	Arafura	Darwin	NLC	31	28	28
53	Pigeon Hole	Big Rivers	Katherine	NLC	17	11	0
54	Pirlangimpi	Arafura	Darwin	TLC	117	117	117
55	Pmara Jutunta	Central	Southern	CLC	36	40	0
56	Ramingining	Arnhem	Darwin	NLC	120	151	151
57	Rittarangu	Big Rivers	Katherine	NLC	16	16	0
58	Robinson River	Big Rivers	Katherine	NLC	39	38	0
59	Santa Teresa	Central	Southern	CLC	107	139	139
60	Tara	Barkly	Southern	CLC	21	22	0
61	Titjikala	Central	Southern	CLC	42	38	0
62	Umbakumba	Arnhem	Darwin	ALC	75	0	0

#### Northern Territory Remote Prepayment Meters by Community

FFA #	FFA Footprint Communities	TFHC Region	PowerWater Region	Land Council	OC-OF-OH 30 June 2024	Total Number of Prepayment Meters	Number of Prepayment Meters Capable of Reporting Self-Disconnection
63	Wadeye	Arafura	Darwin	NLC	303	309	309
64	Wallace Rockhole	Central	Southern	CLC	31	32	0
65	Warruwi	Arafura	Darwin	NLC	70	69	69
66	Weemol (See Bulman)	Big Rivers	Darwin	NLC			
67	Willowra	Central	Southern	CLC	44	48	0
68	Wilora	Central	Southern	CLC	29	28	0
69	Wurrumiyanga	Arafura	Darwin	TLC	306	330	330
70	Yarralin	Big Rivers	Katherine	NLC	52	54	54
71	Yirrkala	Arnhem	Darwin	NLC	119	152	152
72	Yuelamu	Central	Southern	CLC	36	42	42
73	Yuendumu	Central	Southern	CLC	127	139	139

#### Abbreviations

FFA Federal Funding Agreement - Northern Territory Remote Housing

TFHC Department of Territory Families, Housing and Communities

OC-OF-OH Our Community. Our Future. Our Homes

#### Notes

1. Federal Funding Agreement available at: <a href="https://federalfinancialrelations.gov.au/sites/federalfinancialrelations.gov.au/files/2024-07/10%20Year%20Remote%20Housing%20FFA%20Signed\_0.pdf">https://federalfinancialrelations.gov.au/sites/federalfinancialrelations.gov.au/files/2024-07/10%20Year%20Remote%20Housing%20FFA%20Signed\_0.pdf</a>

2. OC-OF-OH Progress Overview available at: <a href="https://ourfuture.nt.gov.au/accountability-and-reporting/program-progress">https://ourfuture.nt.gov.au/accountability-and-reporting/program-progress</a>

### Northern Territory Remote Prepayment Meters by Region

TFHC Region	FFA Footprint Communities	OC-OF-OH 30 June 2024	Total Number of Prepayment Meters (PPMs)	Number of PPMs Capable of Reporting Self-Disconnections	% Smart
Arafura	13	1689	1737	1681	97%
Arnhem	9	1057	935	935	100%
Barkly	7	297	306	81	26%
Big Rivers	20	1045	1074	892	83%
Central	24	1167	1220	573	47%
Total	73	5255	5272	4162	79%

PowerWater Region	FFA Footprint Communities	OC-OF-OH 30 June 2024	Total Number of Prepayment Meters (PPMs)	Number of PPMs Capable of Reporting Self-Disconnections	% Smart
Darwin	26	2927	2856	2800	98%
Katherine	16	864	890	708	80%
Southern	31	1464	1526	654	43%
Total	73	5255	5272	4162	79%

Land Council Region	FFA Footprint Communities	OC-OF-OH 30 June 2024	Total Number of Prepayment Meters (PPMs)	Number of PPMs Capable of Reporting Self-Disconnections	% Smart
ALC	3	263	0	0	0%
CLC	34	1670	1743	871	50%
NLC	33	2788	2963	2725	92%
TLC	3	534	566	566	100%
Total	73	5255	5272	4162	79%

#### Abbreviations

FFA	Federal Funding Agreement - Northern Territory Remote Housing
TFHC	Department of Territory Families, Housing and Communities
OC-OF-OH	Our Community. Our Future. Our Homes