31 March 2017

Mr Justin Martyn

Director Utilities Commission

GPO Box 915

Darwin NT 0801

Dear Justine,

Thank you for the opportunity to be involved in the Review of the Electricity Standards of Service Code and Guaranteed Service Level Code.

Please find attached our submission for your consideration.

Yours sincerely,



Allison O’Connor

Manager Financial Services

Somerville Community Services Inc.

**REVIEW OF THE ELECTRICITY STANDARDS OF SERVICE CODE AND GUARANTEED SERVICE LEVEL CODE**

**Overview of Somerville Community Services Inc.**

Somerville Community Services is a non-government, not for profit, youth, family and community welfare organisation. Somerville provides essential community based services to Darwin, Palmerston and Katherine and surrounding rural areas.

The organisation has three service arms:

* Family Services which delivers free counselling and family support services, community programs and supported accommodation.
* Financial Services which works with individuals, couples and groups to assist them to successfully navigate financial crisis.
* Disability Services which delivers supported accommodation and outreach for people with disabilities.

Somerville’s Financial Services and Family Services staff work very closely to ensure an appropriate suite of wrap around services is offered to individuals, couples and families who are either in a crisis situation, or at risk of moving into a crisis situation. The Jacana Energy and Power and Water Corporation Hardship Programs form part of a number of services and interventions that assist vulnerable Territorians.

In consideration of the current review of the Electricity Standards of Service Code and in particular the current Customer Hardship measures we would like to highlight the follow factors.

**1. Effective Management of consumer concerns and complaints in the Northern Territory**

The climate, geography distance, access to services coupled with homelessness and vulnerable people are challenges for the provision of water and energy into rural and remote communities. These challenges are very specific to the Northern Territory

The Northern Territory, unlike other states with the exception of Western Australia, does not have its own Energy Ombudsman. Presumably the Northern Territory Ombudsman would have a role to play in the resolution of issues concerned with energy, but only as a point of last resort if direct complaints to Jacana Energy and or PowerWater fails.

The role of the Australian Energy Regulator is further removed as it does not resolve disputes between energy customers and their retailer or distributor. However, it does receive reports on complaints and disputes from energy businesses and the ombudsman schemes (across Australia) and uses this information to monitor compliance.

**Recommendation:**

That the Commission consider the establishment of an office of Energy and Water Ombudsman, Northern Territory.

**2. No mention of vulnerable people in the Commission’s performance against its primary functions:**

 Dot point 6 (page 5) states that in performing it functions the Commission must have regard to the need to:

‘Protect the interests of consumers with respect to reliability and quality of services and supply in regulated industries’

An additional dot point is required to highlight the Jacana Energy and Power and Water Corporation Hardship Programs and could read as follows:

‘Protect the interests of vulnerable people with respect to ensuring security of resources and the long term sustainability of the Jacana Energy and Power and Water Corporation Hardship Programs’

**Recommendation:**

That the Commission add another clause to its performance against primary functions to reflect its ongoing commitment to vulnerable people.

**3. Current Hardship Programs**

Both Jacana Energy and PowerWater provide Stay Connected (financial hardship) Programs.

People accessing the Stay Connected programs through Somerville typically are from low income backgrounds and/or are experiencing crisis in their lives. These people are most likely to be renting a residence, so we encounter more people with overdue power bills rather than water bills.

While the programs are helpful in assisting people through periods where they are at risk of losing their power and/or water, the Stay Connected programs do not address the situation where the ability to pay power and water bills will always be a struggle for many individuals and families.

However, the Stay Connected programs do provide immediate relief for many and is often a hook into community based organisations that provide services that educate and inform people about money management and complementary wrap around support services.

**Customer Hardship Measures Performance Indicators:**

The performance indicators attached to Schedule 3 – RETAIL SERVICES PERFORMANCE INDICATORS require urgent review.

These indicators are presently a record of numbers in and numbers out, combined with an indicator about the average electricity bill.

Whilst we acknowledge the existence of the Jacana Energy and PowerWater Stay Connected (financial Hardship) policy documents there does not appear to be any performance indicators to measure the effectiveness of these policies and associated practises.

The current performance indicators do not facilitate the collection of valuable data on (a) the reasons why people access the programs; and (b) what can be done to improve the programs into the future.

For example, would it be useful to know:

* the number of people accessing the program who are experiencing domestic violence, mental illness or serious illness (there may be more)
* demographic information (age, location, gender etc.)
* the number of people who were made aware of any other assistance schemes eg. The Northern Territory Pensioner Concession Scheme.

Of note is the fact that in the Northern Territory there is only one provider for both Electricity and Water supplies. The current performance indicators appear to assume that there are multiple entities and that customers have a choice of provider.

This review provides a real opportunity to ensure that the Northern Territory Electricity Standards of Service Code is a functional and relevant code that is specifically Territory orientated. Taking into consideration all of the factors that underlay the type of hardship experienced here in the Territory.

While some of the current indicators may be retained within a review, it is important that the review considers the usefulness of these performance indicators to date and discard any that have no practical use to the ongoing sustainability of the program.

**Recommendation:**

That the performance indicators (Customer Hardship Measures) are reviewed with the aim of developing indicators that gather meaningful evidence based data to support the long term sustainability of the Hardship Policies.