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YOUR REF: 18:D24:24361

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Utilities Commission
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Dear Commissioner

Review of the Electricity Industry Performance Code

Thank you for the opportunity to make a submission in response to the "Review of the Electricity Industry Performance Code" (**Consultation Paper**) released by the Utilities Commission (**Commission**) on 11 September 2024.

Feedback in response to the Consultation Paper has been provided at Appendix A.

If you have any questions or wish to discuss any matter raised in this submission, please do not hesitate to contact Jacana Energy via email at [redacted]

[redacted]

Appendix A

Question No.	Question Detail	Jacana Energy Response
Q1	Are there any administrative or minor improvements to the EIP Code that stakeholders have identified and would like to bring to the Commission's attention?	The Commission could consider providing tools and templates to support entities in their reporting. Similar to the AER's Performance Reporting Template, a EIP Code reporting template could be developed that details the metrics, disaggregation requirements and methodology for calculations. The template could also provide data analysis prompts that guide entities to provide commentary that aligns to the Commission's requirements. Annual totals could be formula driven to support consistency in how totals are calculated. Such a tool would also increase formatting consistency which may benefit the Commission in its use of the reporting.
Q2	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?	Yes, the current reporting exemption provision under cluse 5.1.3 of the EIP code is appropriate. In Jacana Energy's experience, clause 5.1.3 clear and straight forward to implement. It also benefits from not being overly prescriptive.
Q3	Should there be a broader exemption clause in the EIP Code to cover more than reporting obligations? Why or why not?	Jacana Energy supports the inclusion of a broader exemption clause, in addition to the existing report exemption provision under 5.1.3 of the EIP Code, if it improves flexibility for reporting entities. Should a broader exemption clause be included, Jacana Energy would appreciate the opportunity review and provided feedback on, if any, the draft clause before it is finalised.
Q4	If the answer to question 3 is yes, should the EIP Code include criteria or principles that the Commission must consider when granting an exemption? If so, are the criteria/principles outlined in this paper appropriate? Why or why not?	Jacana Energy notes that the existing exemption clause under 5.1.3 of the EIP Code does not provide criteria or principles for granting an exemption and, from Jacana Energy's perspective, sufficiently enables the exemption process. It may therefore not be necessary to prescribe the criteria / principles within the EIP Code that the Commission will consider when assessing / granting an exemption. Notwithstanding the above, the criteria/principles outlined in the Commission's paper appear reasonable.
Q5	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?	Yes, if the Commission requires historical data to be segmented by quarter, this should be made explicitly clear within with EIP Code. This may reduce the likelihood of reporting entities not segmenting historical data by quarter.

Question No.	Question Detail	Jacana Energy Response
Q6	What challenges, if any, do entities face in segmenting historical data, such as quarterly? How could these challenges be addressed?	Segmenting historical data, in general, should not pose material challenges for reporting entities so long as the historical segmentation aligns with the segmentation applied in the during the relevant reporting year. For example, segmenting the historical data for FY2022/23 by quarter should be relatively simple as the FY2020/23 reporting submission was submitted as query. If in FY2024/25 submission the Commission wanted to change the historical data segmentation to monthly, this would be more challenging to amend for FY2022/23. This challenge is primarily driven by the fact that models, tools and data sources evolve over time. Should the Commission seek to change data segmentation, Jacana Energy believes this should not be retrospectively applied to historical data. This is because reporting entities may be required to spend resources amending models and tools for no clear benefit to customers. Where reporting entities have provided annual historical data instead of quarterly historical data, it may be more challenging to amend, particularly where corrective adjustments to historical figures have been applied at an annual level and not disaggregated by quarter. However, once corrected this should be less challenging going forward.
Q21	How might the proposed changes to the AER's performance reporting procedures and guidelines impact stakeholders' associated operations and reporting under the EIP Code?	More generally, changes to indicators can require system and process change, which can be onerous to reporting entities. The proposed changes to indicators focusing on complaint-related performance indicators and specific customer groups segmentation are no exception to this. If any changes to the EIP Code were to be considered, sufficient timeframes for implementation would be required due to the complexity and effort required to design, develop (or reconfigure), test and implement changes to systems which capture and report the data metrics. Entities may also need to capture and develop data sets to inform reporting. Jacana Energy foresees challenges with retrospectively applying new reporting metrics / segmentation and is of the opinion that retrospective application should not be mandatory. Increasing the frequency of performance indicators should only be considered where there is a demonstrated benefit in doing so. Increasing the frequency of reporting data will add costs that are ultimately passed on to customers. As noted in Jacana Energy's response to question 6, it would also be challenging to retrospectively adjust historical data segmentation to monthly and Jacana Energy is of the opinion that retrospective application should not be mandatory.

Question No.	Question Detail	Jacana Energy Response
Q22	Are there specific challenges stakeholders foresee with implementing the AER's proposed changes to relevant indicators and are associated refinements to the EIP Code required?	Jacana Energy does not support increasing the reporting frequency to the Commission or the segmentation of data beyond quarterly. Requiring reporting entities to submit reporting at a frequency greater than annually (i.e. quarterly) would increase the administrative burden on reporting entities, resulting in higher costs that would ultimately flow through to customers. Whilst some entities may prepare the reporting at a quarterly frequency for internal reporting purposes, most reporting entities will apply additional layers of review and interrogation before submission to the Commission. Changing the reporting segmentation would be challenging or not possible to apply retrospectively, where data had not been previously collected. Not requiring retrospective application of the amendments would be beneficial. Changing the segmentation prospectively may require reporting entities to develop new systems and processes to collect the data, and therefore reporting entities would need to be allowed time to implement the change. Increasing the reporting frequency or level of segmentation should only be driven by a need from the Commission that derives a tangible benefit for the industry and customers.
Q23	Should customer service-related indicators be expanded to capture modern communication methods? If so, why?	Jacana Energy does not think customer service-related indicators should be expanded to capture modern communication methods at this point in time. This change requires careful consideration of the implementation costs versus benefits. Any new metrics for modern communication platforms, such as online chat and digital communication, should be thoroughly scoped in consultation with retailers. Current data capture and system availability can be limited, and expanding these capabilities will necessitate investment.

Question No.	Question Detail	Jacana Energy Response
Q24	Do stakeholders support the introduction of a Territory-specific overarching meter-related complaint category, rather than no meter-related complaint category or multiple meter related categories consistent with the AER Guidelines? Why or why not	Jacana Energy does not support the addition of a specific meter-related complaint category. Jacana Energy acknowledges there has been increased complaints from customers driven by the smart meter rollout, however, envisages this will not persist beyond the meter rollout. If such reporting was a requirement, it would need to be clear what meter related complaints sit with retailers versus the Meter Service Provider (MSP). For example, should retailers be responsible for performance reporting on issues such as failures to send connection service orders for meter exchanges, given the MSP is accountable for failures to change meters within agreed timeframes. The details of the new metrics would need to be carefully scoped in consultation with retailers to ensure meter-related complaints are appropriately segmented to highlight the root cause.
Q25	Should the EIP Code include a definition of 'energy bill debt'? Why or why not?	Yes, the EIP Code should include a definition of 'energy bill debt' as this will provided clarify to reporting entities and support consistency.
Q26	If the answer to question 25 is yes, should the definition be consistent with what Territory retailers are currently reporting, or align with updated AER guidelines, which would require more detailed/segmented data?	Jacana Energy believes the definition should remain consistent with what Territory retailers are currently reporting. Currently, customers are on a mix of monthly and quarterly billing cycles. The new definition will require additional testing to ensure the measure's robustness. The prevalence of quarterly billing causes significant fluctuations at the 30-day debt level which would require more detailed/segmented data.