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SACOSS



The Manager – MCE Secretariat
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11 November 2005

To the Ministerial Council on Energy,

We are pleased to present a joint response on behalf of the Councils of Social Service from each Australian state and territory. This submission responds to the invitation from the Ministerial Council on Energy to comment on the *Proposed Framework Schedule for Transfer of Distribution and Retail Functions*, as notified in the *Energy Market Reform Bulletin No 50* (13 October 2005).

The state Councils of Social Service (COSSs) are the peak bodies for the community services sector in each state, and have a strong history of representing the interests of electricity consumers, particularly low-income and disadvantaged consumers.

A redistribution of high level functions has the potential to pose serious challenges to the accessibility and affordability of essential service provision, especially for the low income and disadvantaged consumers the COSSs represent. For example, while changes in energy prices and consumer protections impact all consumers, low income and disadvantaged households are especially vulnerable.

Given the gravity of the proposed changes and the potential impacts on our constituents, it is crucial that the COSSs are consulted in an appropriate and timely manner. The *Proposed Framework Schedule for Transfer of Distribution and Retail Functions* is a brief two page document that lists the proposed changes. It does not include an analysis of the intended purpose of the transfer, nor the likely outcomes and impacts of the changes. It is neither possible nor appropriate to provide a response to all 34 proposed changes as they have been presented.

We look forward to the opportunity to provide a detailed and comprehensive response to the *Public Consultation on a National Framework for Energy Distribution and Retail Regulation* in January 2006. That submission will also include an analysis of the changes highlighted in the *Proposed Framework Schedule for Transfer of Distribution and Retail Functions*. Until then, we feel it is important to inform the Ministerial Council on Energy, that the COSSs would like to be able to contribute our particular expertise to this important consultation process. However, given the limited amount of information provided and the short time frame in which to respond, this has not been possible.

We hope that future consultation with the community on important changes to the regulation of electricity will provide enough time and information to ensure that the consultation process is meaningful and effective.

Yours sincerely,

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