

18th of December, 2006

Manager, MCE Secretariat,
Department of Industry, Tourism and Resources,
GPO Box 9839
Canberra ACT 2601

To the Manager, MCE Secretariat,

Re: Retail Policy Working Group: Working Paper 1: National Framework for
Distribution and Retail Regulation.

We are writing in support of the Victorian consumer advocacy submission submitted by the Consumer Utilities Advocacy Centre, Consumer Action Law Centre, Victorian Council of Social Service, St Vincent de Paul, Tenants Union, Kildonan Child and Family Services and the National Seniors Association.

The Centre for Credit and Consumer Law, Griffith University has the overall objective of promoting the attainment of a fairer, safer and more efficient marketplace for all consumers who use under 100 Megawatt hours per annum and particularly for low income and vulnerable small end-users. The National Consumers Electricity Advocacy Panel funds a research/advocate position in our organisation which is advised by a broad cross-section of Queensland consumer representatives/organisations.

Due to the lack of capacity in our organisation at the current time we cannot comprehensively respond to this Working Paper. However, our overarching principles in relation to a national framework for distribution and retail regulation were outlined in our earlier submission to the MCE in response to the NERA Economic Consulting and Gilbert+Tobin discussion paper entitled: 'Public consultation on a national framework for energy distribution and retail regulation.' These principles are also identified in the Victorian consumer advocacy submission and developed further in response to the details supplied in Working Paper 1. Our organisation has endorsed the Charter of Principles for Energy Supply attached to the Victorian submission.

We continue to believe that, on most matters, the Victorian model provides the best practice regulatory framework, especially on several consumer protection issues.

However, we also wish to draw to the RPWG's attention the fact that many features of Queensland and its electricity industry differ very markedly from those in other jurisdictions. For example, the proposed arrangements for the introduction for full FRC require all retailers (except Ergon) to offer to supply at the uniform (regulated) tariff once they are the responsible retail entity, the uniform tariff system will continue in modified form, and CSO's will only be paid to Ergon. It is important that any national regulations recognise Queensland's special needs and arrangements in these and other areas.

Thank you for your consideration of these matters.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J Bathgate', written in a cursive style.

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