

11 May 2007

David J L Bremner
National Electricity Consumers Advocacy Panel
PO Box 43
Surrey Hills
VIC 3127

By email: djlb@axtonjones.com.au

Dear David

Comment on Advocacy Panel's funding budget 2007/2008

Thank you for the opportunity to comment on the Advocacy Panel's request for comment on its funding budget for 2007/2008. We provide these comments from a long standing working relationship with the Panel and trust you will consider them in due course.

If you require any further information about this submission, please don't hesitate to contact me on 08 8226 4111 or at karen@sacoss.org.au

Yours sincerely

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

Karen Grogan
EXECUTIVE DIRECTOR



SACOSS

*South Australian Council
of Social Service*

**National Electricity Consumers Advocacy Panel
Submission to request for comment on
advocacy agenda
*May 2007***

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About The South Australian Council of Social Service (SACOSS)

SACOSS is the peak organisation for community service organisations in South Australia. Our membership numbers in excess of three hundred and consists of committed organisations and individuals who provide services for and are interested in the protection of the interests of low income and disadvantaged consumers in South Australia.

The Advocacy Panel's advocacy agenda

We agree with the Panel's broad approach to its funding allocation and note with interest that the agenda will not rigidly exclude projects not on the current list. We agree with the Panel's observation of the need for flexibility in the advocacy approach and appreciate their willingness to consult with end user advocates to define this agenda.

SACOSS provides comment on the following elements of the agenda based on the actions of our upcoming project and from the perspective of our position as an advocacy and policy organisation with the key interest of protecting and promoting the interests of low income and disadvantaged consumers.

The Australian Energy Regulator

Appropriate regulation remains a key concern for protection of the interests of low income and disadvantaged consumers within the National Electricity Market (NEM). Input from these consumers remains an essential element of well structured regulation and SACOSS agrees with the Panel's approach to advocacy in this area. We remain interested in events occurring in South Australia such as the upcoming AGL Retail Price Path and ESCOSA Retail Price Path and feel that state specific regulation should not be excluded from the Panel's advocacy agenda.

The Australian Energy Market Commission

We note the Panel's 'A' priority rating given to the reviews of effectiveness of competition in the gas / electricity retail markets and agree that this process should remain a primary concern for the Panel when considering their advocacy agenda. We also note with concern, the 'B' rating given to rule changes. Rule changes have the capacity to affect all areas of electricity supply and regulation and have the potential to impact extensively on low income and disadvantaged consumers. For this reason advocacy work is essential in this area. We strongly suggest that this be given an 'A' priority rating.

Essential Services Commission of South Australia

We note the Panel's intention to remain committed to funding advocacy work related to the Essential Services Commission of South Australia. We agree that this should remain part of the Panel's advocacy agenda and that

consideration needs to be given to the unique perspective of South Australia such as the demand profile and the lead legislator perspective within the NEM when allocating advocacy priorities.

Ministerial Council on Energy

It is critical that the Panel remain committed to funding advocacy work related to the Ministerial Council on Energy (MCE). Contributions made by consumer advocates to the 2006 / 2007 legislative package remain critical to ensuring that the perspectives of low income and disadvantaged consumers are taken into account.

We agree with the Panel's allocation of 'A' priority listings to the majority of advocacy priorities arising from the work of the MCE.

Other advocacy actions

An integral part of electricity advocacy for SACOSS is linking with worker advocates who aren't necessarily funded by Panel activity. By funding this kind of advocacy, the Panel would allow the funded organisation to liaise with a considerable number of other organisations, their workers and their clients rather than simply remain within their own organisation. This kind of advocacy builds capacity in the community sector and empowers voluntary advocacy groups, while generally adding to the strength of advocates in South Australia to ensure fair and equitable policy in relation to utilities. We respectfully request that the Panel consider including this important work in their advocacy agenda.