

4 February 2011

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Thank you for the opportunity to comment on the AER Discussion Paper on *Objectives and priorities of electricity network service provider performance reports* December 2010.

The Energy & Water Ombudsman NSW investigates and resolves complaints from customers of electricity and gas providers in NSW, and some water providers.

EWON believes that objectives of performance reporting are correctly identified in the discussion paper as improvement of the regulatory framework, transparency, accountability and performance improvement.

EWON notes that the National Energy Consumer Framework clearly established that there is a direct relationship between Network Service Providers (NSPs) and customers. While the AER quite correctly emphasises performance reporting priorities in the context of the AER role of economic regulator, it is critical that the relationship between NSPs and their customers also be the subject of performance reporting.

In NSW distributors report to IPART on the following performance indicators:

- Timely provision of connection services
- Timely notice of planned interruption to supply
- Repair of faulty streetlights
- Call centre responsiveness
- Customer complaints

EWON considers that performance indicators such as these will become even more important as the retail arms of the current New South Wales NSPs are to be completely separated from 1 March 2011, and customer services such as call centres and complaint handling will no longer be shared services with a retail division.

If you would like to discuss this matter further, please contact me or Chris Dodds, Senior Policy Officer on 02 82185250.

Yours sincerely



Clare Petre
Energy & Water Ombudsman NSW