Respondent details

R1 - I am responding to the Energy Legislation Review Stage 2 Options Paper as a company, organisation or agency

Individual respondent details
Age
Name
Email address
Please re-enter your email address

Company respondent details
Name of company, organisation or agency
Energy Efficiency Council

Name of the best contact person from your company, organisation or agency. For example John Robinson

Topic 1 Purpose of state energy laws i.e Objectives of the Acts
Q1.1 Of the Options considered for this Topic, which one do you prefer?
I have no interest in this topic
Q1.2 Why?
Q1.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 2 Energy efficiency and demand management
Q2.1 Of the Options considered for this Topic, which one do you prefer?
I do not like any of the options
Q2.2 Why?
Helping homes and businesses manage energy use is critical to reduce energy bills and greenhouse gas emissions. Improved energy management could reduce many Queensland households’ and businesses’ energy bills by over 30 per cent. However, an internal assessment by the Energy Efficiency Council rates Queensland as providing the least support for energy management out of any jurisdiction in the National Electricity Market. As a consequence, Queensland homes and businesses aren’t getting the support that they need to manage energy and Queenslanders are paying far more for energy than they need to. The Queensland Government must deliver a major expansion in energy management programs. The Queensland Government has previously committed to develop an energy management strategy, but still hasn’t delivered on this
commitment. In this context, it is deeply disturbing that the only action related to energy management being contemplated in the ‘Review of Queensland’s energy legislation’ is the removal of existing provisions to support energy management. The Energy Efficiency Council opposes all three of the options presented in section 2.2 of the RiS Options Paper, and strongly opposes Options 2 and 3. Option 1 (status quo) is the least-worst option presented, but the Queensland Government should adopt a new option – “Option 4: substantial expansion of energy efficiency and demand management measures”. The Energy Efficiency Council also opposes the specific proposal in the RiS Options Paper, namely the removal the requirement that “Queensland electricity distributors must plan and report on demand management activities under both applied national rules and state regulation”. First, and most critically, national requirements relating to demand management “do not currently apply to 33 isolated networks operated by Ergon Energy”. Removing state requirements before national requirements are introduced is nonsensical. Second, the Australian Energy Regulator (AER) has only recently begun to ramp up its work in demand management, and removing state requirements in advance of the AER establishing and demonstrating its capabilities in this area is premature. Third, the Queensland Government owns Queensland’s electricity distributors, and it makes sense that distributors would report their demand management activities to both their owner and the national regulator. Therefore, the costs today of removing the requirement for electricity distributors to report on their demand management activities to the Queensland Government would significantly exceed the benefits, which are only estimated at $20,000 per annum. We strongly recommend retaining the requirement that ‘Queensland electricity distributors must plan and report on demand management activities under both applied national rules and state regulation’ until the national regime is both mature and in place for all networks in Queensland.

Q2.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 3 Interaction with applied national laws
Q3.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q3.2 Why?
Q3.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 4 Licensing
Q4.1.1 For generation, of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q4.1.2 Why?
Q4.1.3 For generation, thinking of your preferred Option, would you like to suggest any improvements?

Q4.2.1 For network businesses, of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q4.2.2 Why?
Q4.2.3 For network businesses, thinking of your preferred Option, would you like to suggest any improvements?

Q4.3 FEEDBACK WANTED on electric vehicle charging stations and licensing. Stakeholder feedback is sought on the benefits, disadvantages and risks of licensing electric vehicle charging stations under the Electricity Act, or via the exemptions framework.
Topic 5 Powers of entry and resumption
Q5.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q5.2 Why?
Q5.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q5.4 FEEDBACK WANTED Electric vehicles and powers of entry. Stakeholder feedback is sought on the benefits, disadvantages and risks of classifying electric vehicles connected at premises as part of an electrical installation for the purposes of entry.
Blank (I have no interest in providing feedback)
Q5.4 Please provide your feedback below

Topic 6 Technical requirements
Q6.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q6.2 Why?
Q6.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q6.4 FEEDBACK WANTED Electric vehicles and network connection agreements. Stakeholder feedback is sought on the advantages, disadvantages and risks of requiring electric vehicle owners to seek network approval under the Electricity Act to install an electric vehicle charger which is configured to export, or to otherwise inform the network of their purchase.
Blank - I have no interest in providing feedback
Q6.4 Please provide your feedback below

Q6.5 FEEDBACK WANTED Electric vehicles and definition of electrical installation. Stakeholder feedback is sought on the advantages, disadvantages and risks of extending the definition of electrical installation to electric vehicles.
Blank - I have no interest in providing feedback
Q6.5 Please provide your feedback below

Q6.6 FEEDBACK WANTED Excluded customers. Stakeholder feedback is sought on the whether any adjustment may need to be made to either the National Energy Retail Law (Queensland) or the definition of excluded customer in the Electricity Act to account for new technology (e.g. solar and batteries) or new stand-alone power systems (noting the Australian Energy Market Commission is also considering this issue).
Blank - I have no interest in providing feedback
Q6.6 Please provide your feedback below
Q6.7 FEEDBACK WANTED Electric vehicles charging stations and technical regulation. Stakeholder feedback is sought on whether the framework for technical standards under the Electricity Act should apply to electric vehicle charging stations. Blank (I have no interest in providing feedback) Q6.7 Please provide your feedback below

Topic 7 Price control
Q7.1 Of the Options considered for this Topic, which one do you prefer? Blank - I have no interest in this topic Q7.2 Why? Q7.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q7.4 FEEDBACK WANTED Electric vehicles and price control. Stakeholder views are sought on the advantages, disadvantages and risks of extending price protections to operators of commercial electric vehicle charging stations. Blank - I have no interest in providing feedback Q7.4 Please provide your feedback below

Q7.5 FEEDBACK WANTED Retail products, services and innovation. Stakeholder views are sought on the value of building greater flexibility into retail products and services for regional customers to address new technologies, and how this could be achieved. Blank - I have no interest in providing feedback Q7.5 Please provide your feedback below

Q7.6 FEEDBACK WANTED Electric vehicles and regional feed-in tariff. Stakeholder views are sought on the advantages, disadvantages and risks of facilitating feed-in tariff payments in regional areas for exports from electric vehicles. Blank - I have no interest in providing feedback Q7.6 Please provide your feedback below

Topic 8 Dispute resolution
Topic 8.1 EWOQ: Embedded network customer fee options Q8.1 FEEDBACK WANTED Stakeholder views are sought on embedded network customer fee options. Blank - I have no interest in providing feedback Q8.1.1 What type of energy disputes are likely to arise between exempt sellers and their customers? Q8.1.2 What dispute resolution mechanisms do embedded network customers currently use in order to have their energy disputes settled? Are customers aware of and successfully using existing mechanisms? Are there any issues with the current mechanisms? Q8.1.3 Are there any stakeholder groups that the department should consider, and consult with, when assessing potential options for embedded network customers? Q8.1.4 Is the predicted number of complaints reasonable based on the information available? Q8.1.5 Do you agree with the proposal for all residential exempt sellers to be automatically deemed to be Energy and Water Ombudsman scheme participants? Q8.1.6 Do you agree with the proposal NOT to require exempt sellers to pay an annual participation (membership) fee? If not, why.
Q8.1.7 Do you agree that the proposed fees for exempt sellers under Option 3 are fair and reasonable, and proportionate to the level of impact the issue or complaint may have on the exempt seller customer? If not please explain why.

Q8.1.8 Are there any other user-pays fee options the department should consider?

Q8.1.9 Do you see any issues with delaying the implementation of the user-pays fee scheme for at least 12 months in order to gather data to increase awareness and understanding of the Energy and Water Ombudsman services before fees are payable?

Topic 8.2 EWOQ: general
Q8.2.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q8.2.2 Why?
Q8.2.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 8.3 Dispute resolution - Regulator
Q8.3.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q8.3.2 Why?
Q8.3.3 Thinking of your preferred Option, would you like to suggest any improvements?

Topic 9 Customer protections
Q9.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q9.2 Why?
Q9.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q9.4 FEEDBACK WANTED Electric vehicles. Stakeholder feedback is sought on the advantages, disadvantages and risks of including electric vehicle customers within the definition of a customer
Blank - I have no interest in providing feedback
Q9.4 Please provide your feedback below

Topic 10 Emergency provisions
Q10.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q10.2 Why?
Q10.3 Thinking of your preferred Option, would you like to suggest any improvements?

Q10.4 FEEDBACK WANTED Operator of last resort (OoLR) and stand-alone power systems. Stakeholder feedback is sought on the adequacy of ss. 130 and 131 to manage potential issues relating to third party stand-alone power systems, in light of Australian Energy Market Commission stand-alone power systems work.
Blank - I have no interest in providing feedback
Q10.4 Please provide your feedback below
Q10.5 FEEDBACK WANTED Emergency powers. What should be the threshold for an emergency supply declaration? What should be the scope of Ministerial direction powers taking account of Ministerial direction powers in other NEM jurisdiction? Would there be an ongoing need for a restriction regulation?
Blank - I have no interest in providing feedback
Q10.5 Please provide your feedback below

Topic 11 Offences and penalties
Q11.1 Of the Options considered for this Topic, which one do you prefer?
Blank - I have no interest in this topic
Q11.2 Why?
Q11.3 Thinking of your preferred Option, would you like to suggest any improvements?