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
Queensland Consumers Association

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?
Blank - I have no interest in this topic
Q2.2 Why?
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?
Queensland Consumers Association

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.
Blank (I have no interest in providing feedback)
Q4.4 Please provide your feedback below

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?
Option 3
Q7.2 Why?
Will better address significant current problems including setting and coverage of regional FiTs, and QCA’s lack of information gathering powers.
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.
I would like to provide feedback
Q7.4 Please provide your feedback below
Run workshops on this to allow detailed stakeholder consideration of the issues and the options.

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.
I would like to provide feedback
Q7.5 Please provide your feedback below
Run workshops on this to allow detailed stakeholder consideration of the issues and the options.

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.
I would like to provide feedback
Q7.6 Please provide your feedback below
Run workshops on this to allow detailed stakeholder consideration of the issues and the options.
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?
Option 3
Q8.2.2 Why?
We have been represented continuously on the EWOQ Advisory Council since it was established in 2007. Throughout this time, due to EWOQ being a statutory body and having only an Advisory Council not a governing Board, in our view EWOQ has been unable to be sufficiently flexible and agile in many areas including responding to changes in demand for its services, funding requirements, charging, scope, and appointments. Examples include: changes in scope have taken far too long (the current situation regarding including embedded networks is a good example); long delays in the making of appointments to the Advisory Council and the appointment of an Ombudsman, and great difficulty adjusting staff levels to reflect major fluctuations in demand for EWOQ's services. Therefore, we consider that Option 3 is much superior to Option 2 because it will allow EWOQ to be much more flexible and agile (i.e. ability to move easily and quickly) in all areas including operations, funding arrangements, staffing, scope, and governance. Very high levels of flexibility and agility are needed to be able to respond to, and anticipate, the many major current and future challenges for EDR schemes in the energy and water sector in order to provide effective and efficient services for consumers and industry. The challenges include substantial fluctuations in demand for EDR services. We recognise that some Queensland legislation will still be required with Option 3. However, there will be much less and it is less likely to reduce flexibility and agility than that likely to be associated with the statutory structure that would be retained under Option 2. We also consider that, because Option 3 would mean that Queensland had the same structure as the EDR schemes in NSW, Victoria and South Australia, this would assist energy retailers who operate in
multiple states and it would be easier to establish a national EDR scheme for energy if this was ever considered desirable.

Q8.2.3 Thinking of your preferred Option, would you like to suggest any improvements?
As indicated in our submission dated 11 June 2018, to reduce terms and condition and entitlement problems due to EWOQ staff being public servants, the adoption of Option 3 could be accompanied by service provision being contracted out at least initially, to another Queensland statutory body, for example the Queensland Ombudsman. This is the model used in Western Australia. We also recommend that the Queensland legislation associated with option 3 include a requirement that an independent review of its effectiveness be undertaken within 3 years of its commencement.

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?
Option 3
Q9.2 Why?
Potentially greater consumer accessibility to concessions but also requiring detailed assessment of whether to require any or all exempt sellers to enter into concessions agreements.
Q9.3 Thinking of your preferred Option, would you like to suggest any improvements?
The option should also address the significant issues arising from wrongful disconnection (deenergisation) of consumers caused by retailers when they undertake disconnections are the meter provider and when disconnections are undertaken by the distribution network operator.

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 I would like to provide feedback
Q9.4 Please provide your feedback below
Run workshops on this to allow detailed stakeholder consideration of the issues and the options.

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?