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SUBMISSION TO: IPART, WATER, PROMOTING A CUSTOMER FOCUS

The Discussion Paper – Promoting a Customer Focus – is a useful analysis but needs to better set out mechanisms to engage customers (both as service consumers and the general community concerned about environment and social issues). We wish to make the following brief points:

1. There should be explicit reference to and implementation of the key sets of principles set out by the government in other policies. One is published by the Information and Privacy Commission:

<https://www.ipc.nsw.gov.au/information-access/open-government-open-data/charter-public-participation>

and the other as required by the EPA&A Act, Community Participation Charter (Div 2.6 and Schedule 1)

<https://www.planning.nsw.gov.au/Policy-and-Legislation/Environmental-Planning-and-Assessment-Act-updated/Guide-to-the-updated-Environmental-Planning-and-Assessment-Act-1979/Part-2-Community-Participation-Plans>

2. Our experience with engaging major utilities is that deeper interaction than conventional processes leads to improved quality and more innovative results. Such interaction also produces a greater informed customer constituency and support for decisions.

Total Environment Centre has had long standing experience with the National Electricity Market (NEM) and key utilities via the arrangements established by Energy Consumers Australia (created by legislation). The ECA is a key plank of the regulatory and price setting mechanisms of the NEM and is funded by a very small levy on the sector. It undertakes research; grants funds to key consumer sectors to investigate proposals and make recommendations; and fosters stakeholder roundtables.

<https://energyconsumersaustralia.com.au/>

While we are not suggesting a full replication of the ECA model – a particular component that could be adopted is the provision of funds under a robust grant program for detailed research and responses to sector proposals. The existing Advisory Group could also be given more capacity to initiate and interrogate.

3. The Discussion Paper considers the makeup of Committees, posing the question of whether they should be expert based. We support a mix of representation from the broader community, customer sectors, and experts. Experts cannot be expected to have a full understanding of community perceptions which are important to an effective customer focus.

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