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8 May 2003

Ms Deborah Walker **Gas** Pricing
Independent Pricing and Regulatory Tribunal

Fax: 9290 2061

Dear Ms Walker

## ActewAGL's miscellaneous charges for the Shoalhaven

Thank you for the opportunity to comment briefly on ActewAGL's proposal to vary its natural gas miscellaneous charges in the Shoalhaven from 1 July 2003, under IPART's Voluntary Pricing Principles (VPPs).

We note that the proposed fees, consistent with ActewAGL's current fees in Queanbeyan and Yarrowlumla, are generally similar to or higher than the fees applied by other natural gas providers in NSW, though in some cases they represent a significant decrease for customers in the Shoalhaven ie account establishment fee reduced by around 45%, and around 66% for pensioners.

We acknowledge efforts **by** providers to increase consistency in pricing for consumers in NSW. **Our** primary comments or queries are in relation to **the** following aspects of ActewAGL's proposal:

## 1. New fees for consumers in the Shoalhaven

The proposal includes four fees that appear to be new for the Shoalhaven **area**: collector call fee, **high** bill field visit fee, late fee and dishonoured payment fee.

These new fees might cause difficulties for some customers, particularly those on low incomes.

We suggest that ActewAGL considers adequate resources for **a** potential increase in customer contacts, and a range of options for customers **who** might experience difficulties in paying the new fees.

## 2. Disconnection / reconnection fee

The 'Description of services and charges' supplied by ActewAGL suggests that separate fees of \$77.00 (including **GST)** will apply for both disconnection and reconnection, **representing** a total increase of **around 250%** for these services for customers in the Shoalhaven. We understand that in practice ActewAGL charges **a** single fee **af \$77.00** on **reconnection** for customers in Queanbeyan.

We **suggest** that **this** position should be clarified.

## 3. Advice to customers about pricing changes

There is no information about how ActewAGL proposes to notify affected customers of the changes. Information to consumers about any significant pricing changes is important, and it would be helpful for this to be clarified,

If you would like to discuss this response please contact me on 8218 5221 or at melissar@ewon.com.au.

Yours sincerely

Melissa Russell

Manager, Public Relations & Policy