



18 November 2013

Early Termination Fees  
Independent Pricing and Regulatory Tribunal  
PO Box Q290  
QVB Post Office NSW 1230

Submitted electronically

Dear Sir/Madam,

**Re: Early Termination Fees: Electricity Draft Report**

Lumo Energy welcomes the opportunity to make a submission to Independent Pricing and Regulatory Tribunal (IPART) in response to the Early Termination Fees: Electricity Draft Report (the Draft Report).

Lumo Energy is 100% owned by Infratil Limited, a company listed on the New Zealand and Australian Stock Exchanges. Lumo Energy currently retails across the National Electricity Market, and is one of the largest second tier energy retailers. As such, it has a keen interest in the outcome of the proposed amendments and the extent to which it promotes efficient investment in the New South Wales electricity market that is in the long term interests of consumers.

Lumo Energy would like to acknowledge IPART's thorough review, taking into account the impact on consumer pricing, retailer costs and competition in the market.

Considering the implementation of the Early Termination Fee (ETF), Lumo Energy would like clarification on the following:

- Does the base ETF, as set by IPART, include or exclude GST?  
In the draft decision, this is not clearly identified.
- At what point does IPART consider that the "retailer commenced selling energy to the customer under the contract"?  
Lumo Energy queries whether this is at the point at which the cooling off period expires and the contract commences? Or is this the point in time where the customer commences taking supply? Lumo Energy considers that once the contract has been established (and the cooling off period has completed) the ETF should apply.

Please contact me on 03 8680 6439 or Stefanie Macri on 03 8683 2427 to discuss this submission further or if you require any further information.

Yours sincerely

A handwritten signature in blue ink, appearing to be "Aneta", with a long horizontal line extending to the right.

**Aneta Graham**  
General Manager, Regulatory Affairs & Corporate Relations  
Lumo Energy NSW Pty Ltd

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