



4 November 2009

SUBMISSION ON QCA INTERIM CONSULTATION NOTICE ON BENCHMARK RETAIL COST INDEX FOR ELECTRICITY 2010-11

BACKGROUND

The Queensland Consumers' Association (the Association) is the peak body for consumer groups in Queensland. The Association's members work in a voluntary capacity. The Association is a member of the Consumers' Federation of Australia, the peak body for Australian consumer groups.

COMMENTS

Since the start of the calculation the BRCI each year, the Association has considered it essential that consumer organisations have the opportunity, and ability, to participate in the consultations undertaken by the QCA.

Accordingly, the Association has participated as actively as its limited resources would allow in each BRCI consultation process.

The Association hopes to also participate in the process for 2010-11.

It is much easier for the Association and other consumer organisations to participate in the BRCI process when the consultation also includes workshops. Workshops help to reduce the massive resource and information imbalance between industry and consumers and facilitates the preparation of written submissions by consumer organisations.

Accordingly, the Association recommends that the QCA include workshops in the consultation program for the calculation of the BRCI for 2010-11.

The Association also recommends that the same methodology be used to calculate the BRCI for 2010-11 as was used for the BRCI for 2009-10, as revised in accordance with the Supreme Court judgement. However, this recommendation is based on the assumption that after 2010-11 either the BRCI will be replaced by another approach to the setting and adjustment of regulated tariffs or the BRCI approach and process will be significantly modified. It is also without prejudice to any position the Association may have in the future on the most appropriate approach or approaches to these matters.

The Association further recommends that full details of all calculations be made available for consideration by all stakeholders.

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