



Independent Pricing and Regulatory Tribunal

Distribution businesses' performance against customer service indicators

For the period 1 July 2004 to 30 June 2009

Electricity — Information Paper
December 2009

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ISBN 978-1-921629-28-3

The Tribunal member for this review is:

Mr James Cox, Acting Chairman and Chief Executive Officer

Inquiries regarding this document should be directed to a staff member:

Gary Drysdale (02) 9290 8477

Kumi Cuthbertson (02) 9290 8479

Independent Pricing and Regulatory Tribunal of New South Wales

PO Box Q290, QVB Post Office NSW 1230

Level 8, 1 Market Street, Sydney NSW 2000

T (02) 9290 8400 F (02) 9290 2061

www.ipart.nsw.gov.au

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1 Introduction

The Independent Pricing and Regulatory Tribunal of NSW (IPART) publishes a series of information papers which aim to ensure that all stakeholders, including customers, have ready access to information about electricity distribution and retail businesses.

In this information paper we have focused on the quality of customer service provided by the three NSW electricity distribution businesses – Country Energy, EnergyAustralia and Integral Energy. Under the current regulatory regime, electricity distribution companies are required to meet guaranteed customer service standards (GCSS) and collect and report on a range of operating statistics. The GCSS establish the minimum standard of customer service that electricity distribution companies must provide in a variety of service areas. Some GCSS also require the companies to make a specified payment to the customers concerned if they fail to meet these standards. Operating statistics indicate how well the business is performing in a range of areas related to customer service, including the extent to which it is meeting the GCSS.

We monitor and assess each company's performance against customer service indicators/operating statistics based on the GCSS. In this information paper we have provided an overview of our assessment of the three companies' performance for the period 1 July 2008 to 30 June 2009 in relation to:

- ▼ timely provision of connection services
- ▼ timely notice of planned interruptions to supply
- ▼ repair of faulty streetlights
- ▼ provision of telephone services, and
- ▼ customer complaints.

For this reporting year, we asked electricity distribution businesses to independently audit their 2008/09 operating statistics prior to submission. The audit found that businesses' systems were generally robust and no material discrepancies were evident in the 2008/09 operating statistics reported to IPART. However, we note that there were some inconsistencies in how businesses have interpreted some performance indicators and we also consider that some indicators may be ineffective. We plan to discuss these findings with the businesses before making recommendations about changes that may be necessary to the operating statistics.

It should be noted that this information paper does not include electricity distribution businesses' performance against design, reliability and performance licence conditions. The businesses report against these conditions separately to Industry & Investment NSW (formerly the Department of Water and Energy).¹

1.1 Overview of electricity distributors' performance

We analysed electricity distributors' current and historical data to identify trends and to compare the businesses' performance. Our key findings for 2008/09 are:

- ▼ The provision of 'on-time' connection services by distributors improved with less than 0.02% of the total connections provided occurring after the agreed date.
- ▼ An increased level of capital works by distributors in the year impacted the number of planned interruptions to customers' supply which increased by approximately 54% overall in NSW. However, around 97% of customers were given adequate notice in relation to planned interruptions to supply and less than 2 per cent of planned interruptions to supply lasted longer than specified.
- ▼ Levels of reported streetlight faults decreased by approximately 11%. Streetlight faults were repaired on average between 3 to 19 working days. Integral Energy and EnergyAustralia met minimum standards for repairing faulty streetlights.² Country Energy did not meet the standard and its performance deteriorated due to a diversion of its resources to a bulk lamp replacement project aimed at reducing the number of spot light outages in the future. Some errors in Country Energy's reporting identified in the recent audit also suggest that the business may have overstated the number of days to repair faults.
- ▼ The percentage of calls answered before being abandoned or dropping out remained relatively stable for Integral Energy (94%) and EnergyAustralia (89%), but deteriorated for Country Energy (66%). Country Energy states there are limitations in its phone system to record this statistic accurately. Country Energy's phone system cannot distinguish between customers who have their inquiries answered by the IVR (interactive voice recognition) system and customers whose inquiries were not addressed and abandoned the call.
- ▼ The percentage of calls answered by a human operator within 30 seconds remained stable for Integral Energy (92%) and EnergyAustralia (80%), but deteriorated for Country Energy (51%). Recent storm and flooding experienced in its area resulted in an inundation of calls to its call centre which accounted for the lowered performance.

¹ Licence conditions relating to reliability performance were imposed on licences held by electricity distribution network service providers in August 2005 and further revised in December 2007. Distribution businesses are required to report on the reliability licence conditions directly to the Minister/Industry & Investment NSW as the technical regulator.

² NSW Public Lighting Code, January 2006, Section 11.2.

- ▼ The level of complaints by small retail customers to their distributors about network matters remains low (less than 0.3% overall in NSW). Of these complaints, the majority (approximately 91%) were made by residential small retail customers.

Further detail on each indicator is provided in the sections below, with a comparison of distributors' performance over the five year period to 30 June 2009.

2 Timely provision of connection services

In NSW, all electricity distributors are required to connect customers to the network by the date agreed with the customer. If distributors do not meet this GCSS, they are required to pay the customer concerned not less than \$60 per day (with a maximum payment of \$300 in relation to any one service).³

Figure 2.1 Electricity Distribution – Number of connections provided after the agreed date

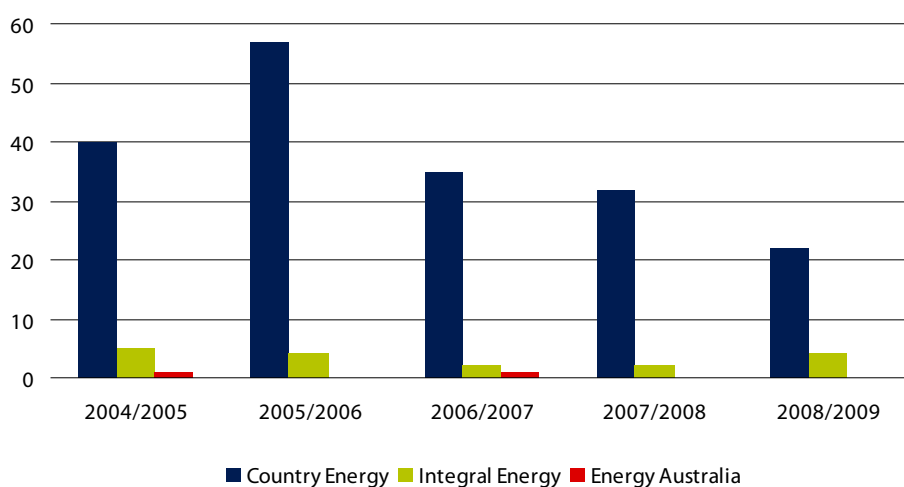


Figure 2.1 shows the number of customer connections not undertaken by the agreed date over the period 2004/05 to 2008/09.

In 2008/09, distributors reported that only 26 out of a total of 233,238 connections were not provided by the agreed date. This represents less than 0.02% of the total connections provided during the year.

³ *Electricity Supply (General) Regulation 2001*, Guaranteed customer service standard pursuant to clause 40 and Schedule 3, Part 2, clause 9.

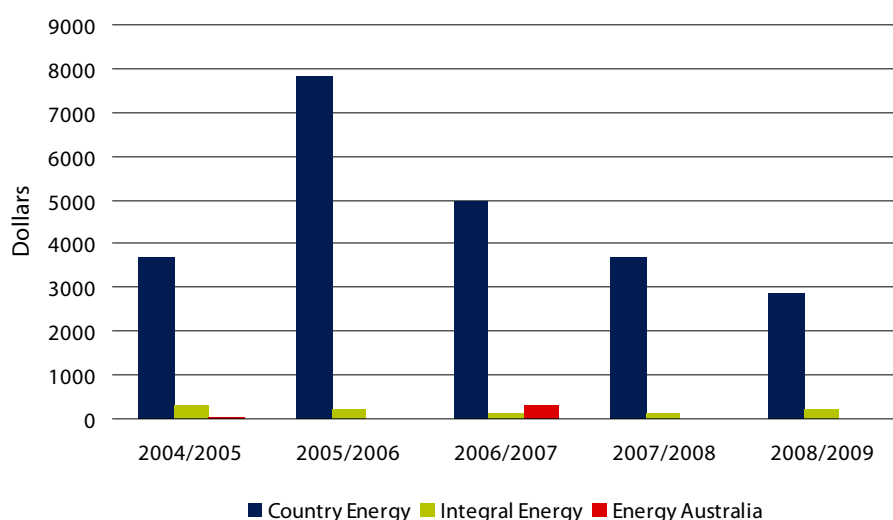
Country Energy has generally reported higher levels of connections not undertaken by the agreed date than other distributors. The business advised that as an additional customer service measure, it sometimes offers customers after hours connections. When an after hours connection is not made, this statistic is captured as a late connection, even if the connection is still completed by the original agreed date. Some delays are also caused by inaccessible meters (for example, locked meter rooms in apartment blocks).

Notwithstanding the above, we note that Country Energy’s performance has improved in 2008/09 and the business advises that it continues to monitor its performance in this area.

The recent audit of electricity distributors’ 2008/09 operating statistics found that businesses re-negotiate connection dates with customers for practical reasons such as site considerations and builder issues. Distributors report this statistic based on the most recent negotiated date.

We consider that, without specific target timeframes within which businesses must provide connections, this statistic will always be low and has limited value as a performance indicator. An indicator that compares the average number of days to connect customers would be more effective as a performance indicator. We plan to discuss this matter with the businesses before making any recommendations to the Minister regarding changes to this GCSS.⁴

Figure 2.2 Electricity Distribution – Value of compensation paid for not providing connections by the agreed date^a



^a For this indicator, some distributors have adopted the policy to only make payments on customer application.

⁴ The Minister for Energy sets the Operating Statistics for energy licensees. IPART has no power to change Operating Statistics, but may make recommendations to the Minister.

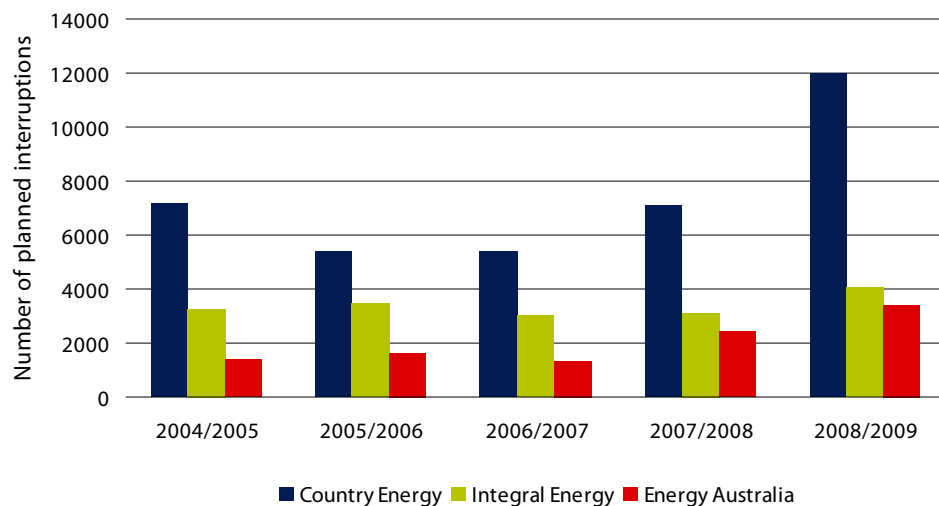
Figure 2.2 shows the value of compensation paid to customers by distributors for not connecting them by the agreed date.

3 Timely notice of planned interruption to supply

Electricity distributors are required to give affected customers at least 2 business days' notice of planned interruptions to supply and must specify how long the interruption will last. If they fail to give the required notice, or the interruption lasts longer than specified, they are required to pay the affected customers not less than \$20 per event.⁵

Figure 3.1 shows the number of planned interruptions to supply that occurred over the period 2004/05 to 2008/09.

Figure 3.1 Electricity Distribution - Number of planned interruptions to supply



Planned interruptions to supply have increased across the industry by 54% overall in 2008/09 since 2007/08; primarily due to increased levels of capital works/infrastructure construction undertaken in the period by the distributors. In particular, Country Energy's planned interruptions to supply have increased by approximately 69% in 2008/09.

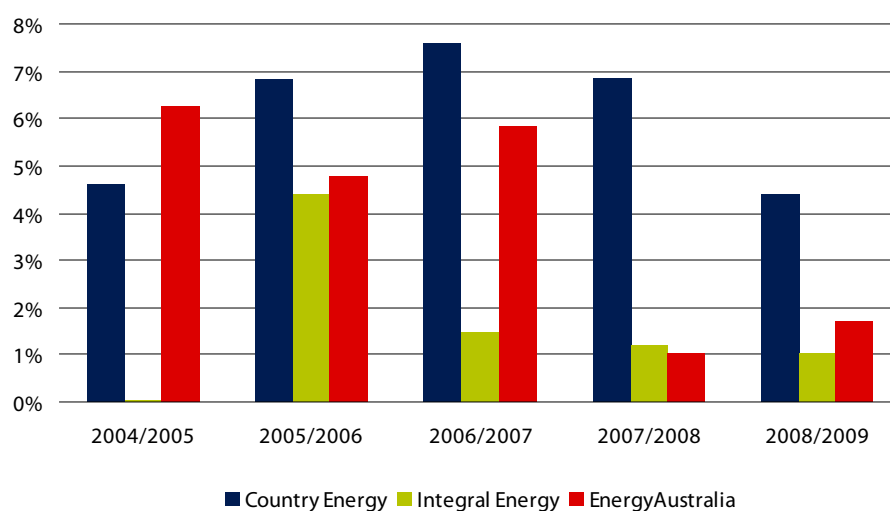
Country Energy has generally reported higher levels of planned interruptions due to the nature of its network, being prominently overhead and radial, which is quite different to the underground and meshed network used in the metropolitan areas. The opportunity for Country Energy to reroute supply and avoid interruptions while undertaking planned maintenance work is not available in a lot of instances. In

⁵ *Electricity Supply (General) Regulation 2001*, Guaranteed customer service standard pursuant to clause 40 and Schedule 3, Part 2, clause 10.

recognition of the current level of planned outages and the levels required to implement its 5 year network plan, Country Energy has reported that it is implementing work practices that will reduce the number of planned interruptions to customers.

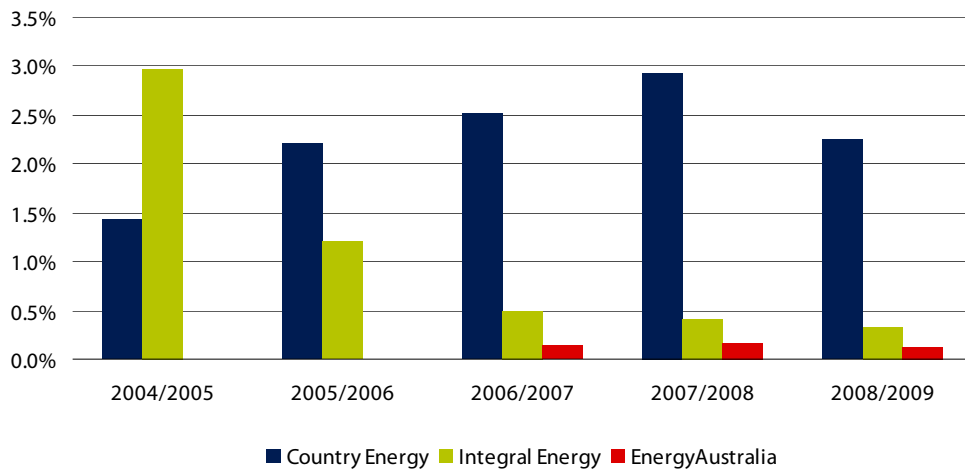
Figures 3.2 and 3.3 show respectively the percentage of those planned interruption to supply where insufficient notice was given and which lasted longer than advised.

Figure 3.2 Electricity Distribution – Percentage of planned interruptions to supply where insufficient notice was given



While the number of planned interruptions to supply increased overall in 2008/09, the majority of customers in NSW that were affected by these interruptions were provided with adequate notice. Performance in this area has improved steadily in recent years with approximately 97% in 2008/09, 96% in 2007/08 and 95% in 2006/07 of NSW customers affected by planned interruptions being provided with adequate notice.

Figure 3.3 Electricity Distribution – Percentage of planned interruptions to supply that lasted longer than advised

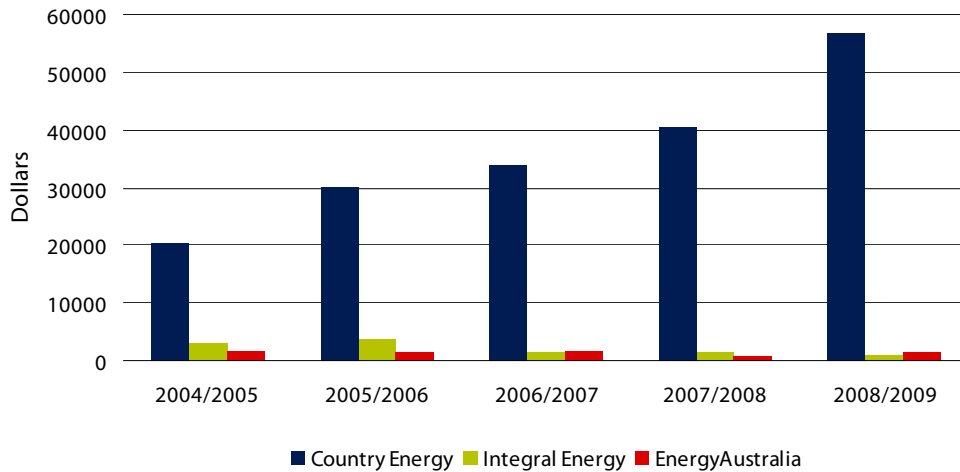


The overall percentage of planned interruptions to supply that lasted longer than specified was below 2% for NSW in 2008/09. We note that performance in this area has improved for all distributors compared to 2007/08.

Country Energy’s ‘over-runs’ are generally higher than other distributors and it states that many reasons for this are outside its control as its distribution area covers 95 per cent of NSW, with 200,000 kilometres of lines and 1.4 million power poles across urban, mountain, coastal tableland and outback environments. Country Energy has implemented measures to drive improvement in this area and expects further improved performance in 2009/10.

Figure 3.4 shows the value of compensation paid to customers in relation to this GCSS for the period 2004/05 to 2008/09.

Figure 3.4 Electricity Distribution – Value of compensation paid for planned interruptions where insufficient notice was given or the interruption lasted longer than specified



Note: Some distributors have adopted the policy to only make payments on customer application. Hence the value of compensation remains low.

As seen in Figure 3.4, Country Energy paid the highest amount of compensation in 2008/09 (approximately \$57,000) for providing insufficient notice or because the interruption lasted longer than specified. This is because with respect to Country Energy, each event can impact a large number of customers because of the nature of its network.

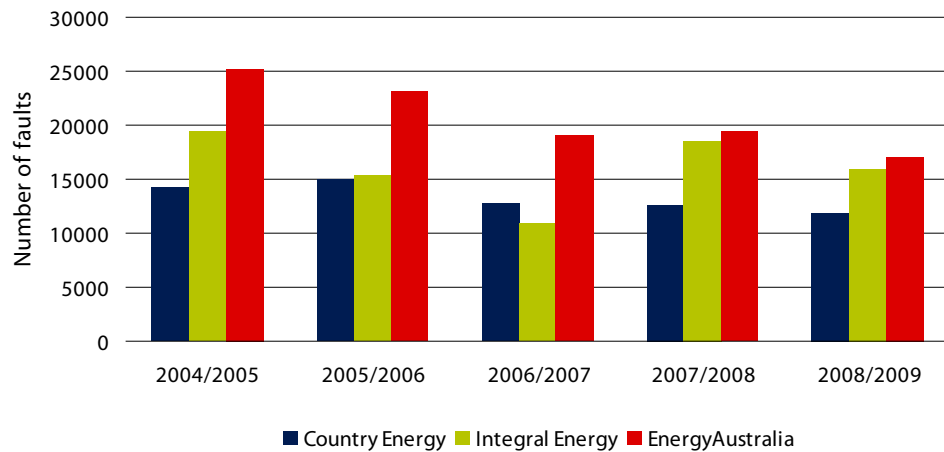
4 Repair of faulty streetlights

All NSW electricity distributors are required to repair faulty streetlights by the date agreed with the customer who reported the fault and to make a payment of not less than \$15 per light if they breach this GCSS.⁶

Figure 4.1 shows the number of reported streetlight faults from 2004/05 to 2008/09.

⁶ *Electricity Supply (General) Regulation 2001*, Guaranteed customer service standard pursuant to clause 40 and Schedule 3, Part 2, clause 12.

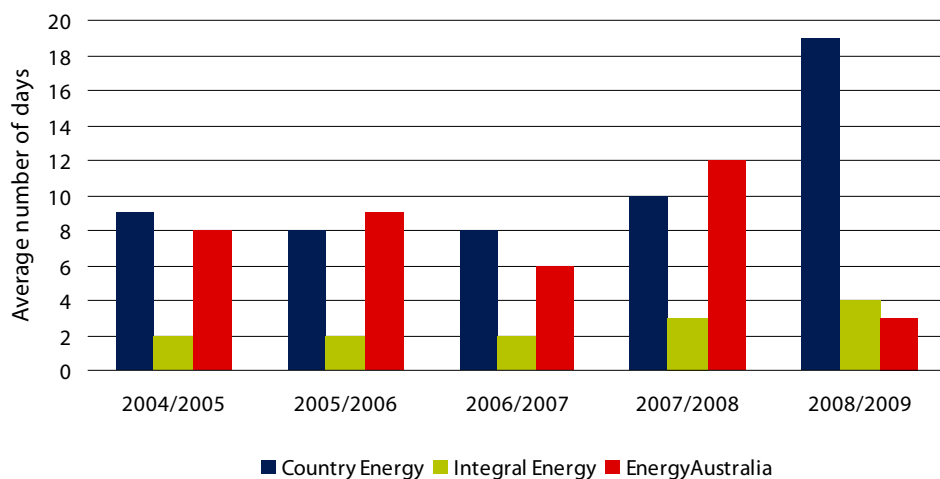
Figure 4.1 Electricity Distribution - Number of reported street light faults



Overall, the level of reported streetlight faults fell by approximately 11% in 2008/09 compared to 2007/08. The lower levels are due to a combination of reasons, including improved reporting by Integral Energy due to the implementation of a new Outage Management System (OMS) and the replacement of older lights with new technology in 2007/08 by EnergyAustralia. Country Energy’s levels of reported street light faults have remained relatively stable compared to 2007/08.

Figure 4.2 shows the average number of working days taken to repair streetlight faults for each distributor.

Figure 4.2 Electricity distribution – Average number of working days to repair streetlight faults



Note: Country Energy and Australian Inland’s data has not been combined on this performance indicator, as it would make it historically disproportionate.

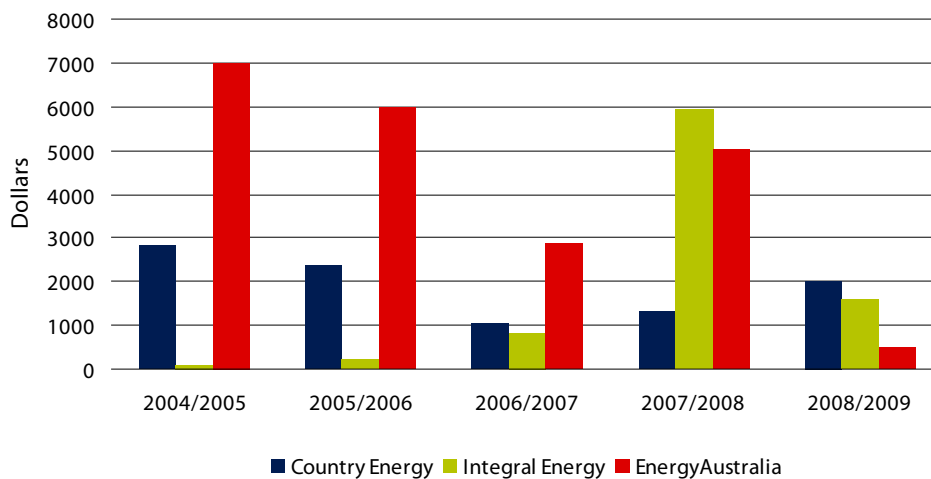
Under the NSW Public Lighting Code, as a minimum standard of service, distributors should repair streetlights within an average of 8 working days of the fault being reported.

NSW distributors have reported that streetlight faults were repaired on average between 3 to 19 working days in 2008/09. EnergyAustralia and Integral Energy met the minimum standard for repairing faulty streetlights, reporting that it took an average of 3 and 4 working days respectively for repairs in 2008/09.

Country Energy reported an average 19 days to repair faulty streetlights. This was primarily due to the business diverting resources to commence a bulk lamp replacement project as a proactive maintenance program aimed at reducing the number of spot light outages in the future. Additionally, it made changes to its reporting system during the year to ensure more accurate reporting. However, the recent NSW audit found that Country Energy may be reporting longer timeframes to repair streetlights as not all completed repairs are entered into the system. Country Energy has undertaken to develop guidelines for its new system to ensure accurate reporting. This issue will be addressed in 2010.

Figure 4.3 shows the value of compensation paid by distributors to customers for breaching this GCSS.

Figure 4.3 Electricity Distribution – Value of compensation paid for not completing street light fault repairs by the agreed date



Note: Some distributors have adopted the policy to only make payments on customer application. Hence the value of compensation remains low.

With the exception of Country Energy for reasons outlined previously, the total compensation paid for not completing street light fault repairs by the agreed date decreased in 2008/09, with an overall decrease of approximately 67% in comparison to 2007/08. In 2007/08, Integral Energy had encountered teething problems with a new system which resulted in higher compensation payments. As well,

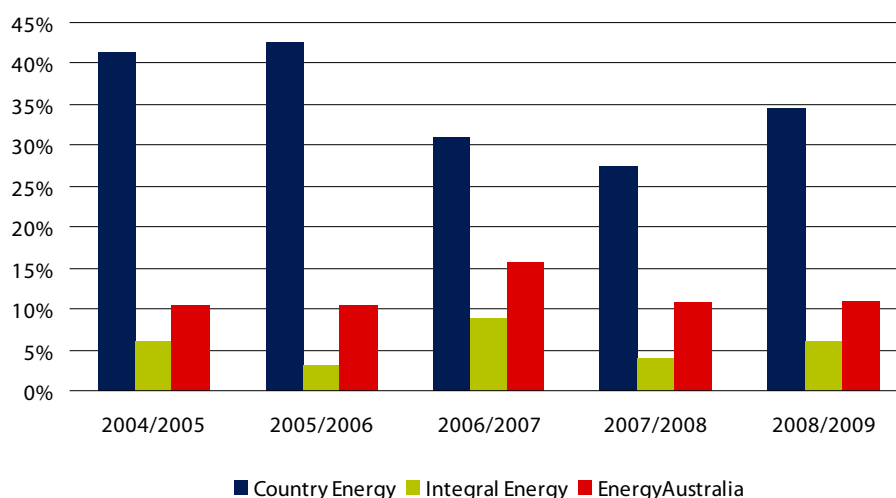
EnergyAustralia had focused on replacement of older lights with new technology rather than repair work, which also resulted in higher compensation payments in 2007/08.

5 Call centre responsiveness

Electricity distributors are required to operate call centre services that provide customers with information concerning faults and difficulties, to which customers can be connected for not more than the price of a local telephone call. In NSW, automated answering services satisfy this requirement if they make provision for calls to be transferred to a human operator.⁷

Figure 5.1 shows the percentage of calls to distributors' call centres that were abandoned or dropped out before being answered by a human operator from 2004/05 to 2008/09.

Figure 5.1 Electricity Distribution – Percentage of calls abandoned or dropped out



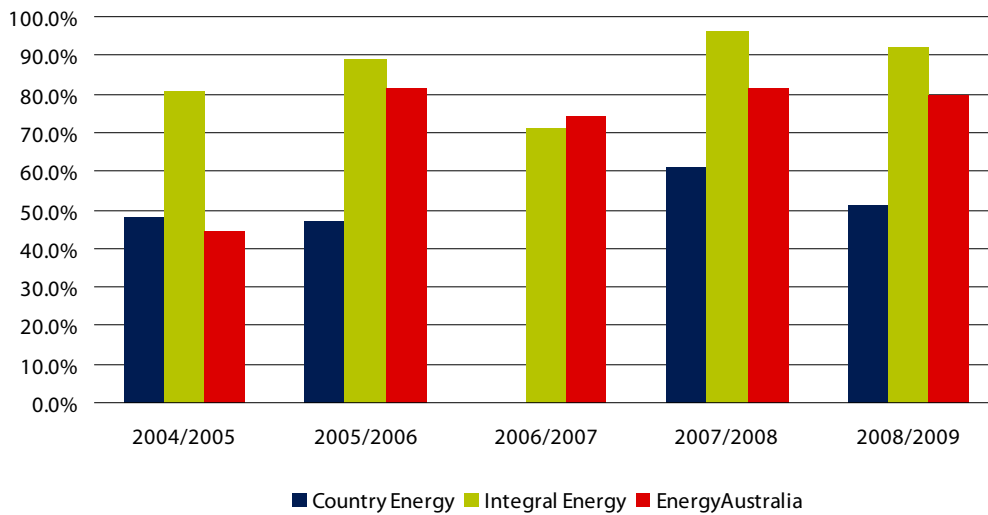
NSW distributors reported that approximately 66% (Country Energy), 89% (EnergyAustralia) and 94% (Integral Energy) of calls were answered before being abandoned or dropping out in 2008/09. Performance for EnergyAustralia and Integral Energy has remained relatively stable in 2008/09; however Country Energy's performance has deteriorated. However, due to limitations within its phone system, Country Energy does not record this indicator accurately.

⁷ *Electricity Supply (General) Regulation 2001*, Guaranteed customer service standard pursuant to clause 40 and Schedule 3, Part 2, clause 11(3).

Country Energy advised that it uses messages via its IVR (Interactive Voice Recognition) system to advise customers of interruptions and the areas affected when it becomes aware of any outages or supply interruptions. It states its phone system cannot distinguish between customers completing a call because they are satisfied with the information received from the recording or abandoning a call because of waiting periods. This is reflected in the higher 'abandoned calls' statistic.

Figure 5.2 shows the percentage of calls answered by a human operator within 30 seconds in the electricity distributors' call centres from 2004/05 to 2008/09.

Figure 5.2 Electricity Distribution – Percentage of calls answered by a human operator within 30 seconds



Integral Energy, EnergyAustralia and Country Energy reported that approximately 92%, 80% and 51% of calls respectively were answered by a human operator within 30 seconds. Performance for Integral Energy and EnergyAustralia remained relatively stable; however Country Energy's performance in this area has deteriorated since 2007/08.

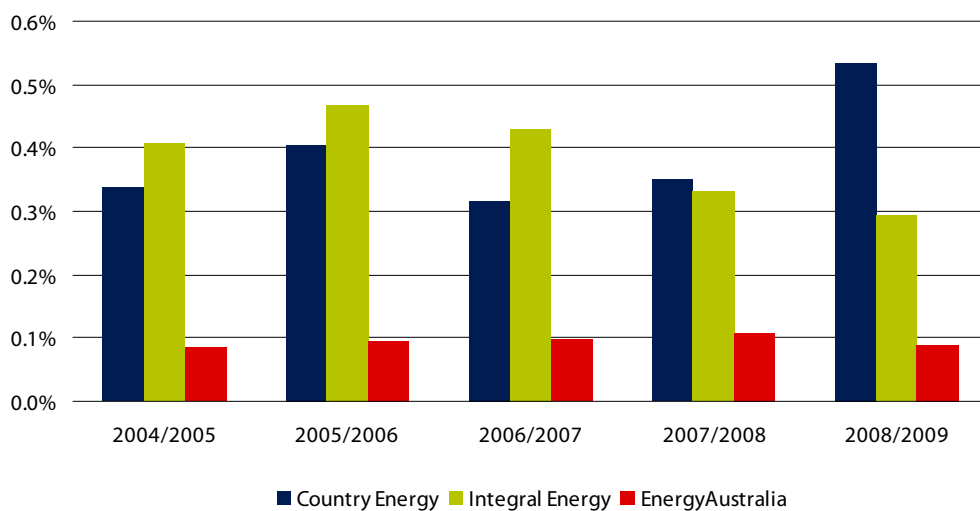
Country Energy states that various events in its network area have contributed to this lowered performance. An example cited was the recent storm activity and flooding experienced in the NSW north and mid-north coast between the 21 and 24 of May 2009, when calls received by its call centre increased significantly and approximately 26,000 customers abandoned calls and did not proceed to a human operator in these few days alone.

6 Customer complaints

NSW distributors are required to collect and report on the number of small retail customers who complain to them in relation to network service matters.

Figure 6.1 shows their performance against this indicator.

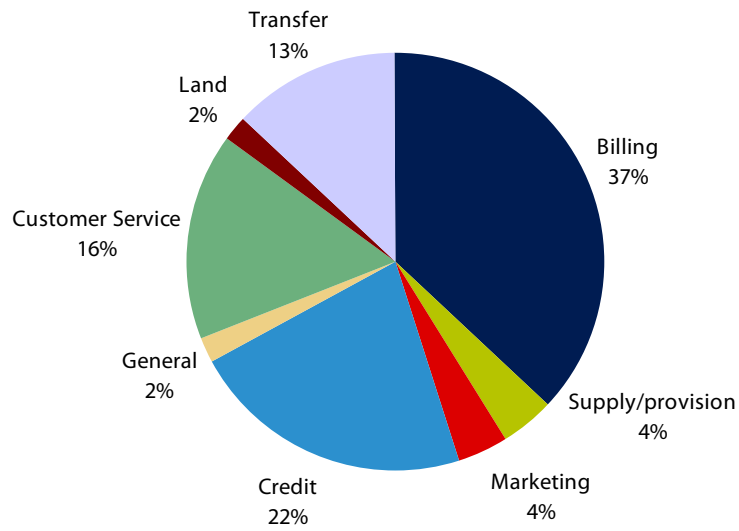
Figure 6.1 Electricity Distribution – Percentage of complaints by small retail customers about network matters



Overall, the level of complaints by small retail customers to their distributors about network matters has remained very low and in 2008/09 was below 0.3% as a proportion of the total NSW residential small retail customer base. The majority of customer complaints (approximately 91%) come from residential small retail customers.

In Figure 6.2 we have charted complaints data published in the Energy & Water Ombudsman NSW (EWON) 2008/09 Annual Report to provide a comparison with distributor's complaints statistics. Please note that complaints made to EWON are a subset of complaints made directly to distributors. Nevertheless, EWON statistics and those reported by the distributors are consistent in showing that network complaints (supply/provision) are low compared to complaints about retail matters.

Figure 6.2 Types of electricity complaints reported to EWON 2008/09



Source: Energy & Water Ombudsman NSW; Annual Report 2008/09, p 14.



Appendices

A Electricity distributor customer service performance data, 2004/05 to 2008/09

Table A.1 Number of connections provided after the agreed date

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	40	57	35	32	22
Integral Energy	5	4	2	2	4
EnergyAustralia	1	0	1	0	0
Grand Total	46	61	38	34	26

Table A.2 Value of compensation paid for late connections (\$)

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	3720	7800	4980	3720	2880
Integral Energy	300	240	120	120	240
EnergyAustralia	60	0	300	0	0
Grand Total	4080	8040	5400	3840	3120

Table A.3 Number of planned interruptions to supply

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	7180	5436	5375	7117	12030
Integral Energy	3269	3480	3062	3113	4082
EnergyAustralia	1437	1615	1335	2464	3443
Grand Total	11886	10531	9772	12694	19555

Table A.4 Percentage of planned interruptions to supply where insufficient notice was given

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	4.6%	6.8%	7.6%	6.9%	4.4%
Integral Energy	0.1%	4.4%	1.5%	1.2%	1.0%
EnergyAustralia	6.3%	4.8%	5.8%	1.0%	1.7%
Grand Total	3.6%	5.7%	5.4%	4.3%	3.2%

Table A.5 Percentage of planned interruptions to supply that lasted longer than advised

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	1.4%	2.2%	2.5%	2.9%	2.3%
Integral Energy	3.0%	1.2%	0.5%	0.4%	0.3%
EnergyAustralia	0.0%	0.0%	0.1%	0.2%	0.1%
Grand Total	1.7%	1.5%	1.6%	1.8%	1.5%

Table A.6 Value of compensation paid where insufficient notice was given or planned interruptions to supply lasted longer than advised (\$)

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	20615	30315	34040	40460	57020
Integral Energy	3260	3940	1420	1320	1100
EnergyAustralia	1800	1515	1640	580	1270
Grand Total	25675	35770	37100	42360	59390

Table A.7 Number of reported streetlight faults

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	14230	15005	12748	12516	11789
Integral Energy	19396	15403	10872	18592	15901
EnergyAustralia	25121	23179	19049	19440	17129
Grand Total	58747	53587	42669	50548	44819

Table A.8 Average number of working days to repair streetlight faults

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	9	8	8	10	19
Integral Energy	2	2	2	3	4
EnergyAustralia	8	9	6	12	3
Grand Total	24	19	16	25	26

Table A.9 Value of compensation paid for not completing streetlight faults by agreed date (\$)

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	2835	2355	1050	1305	2025
Integral Energy	90	225	825	5925	1590
EnergyAustralia	7005	5970	2865	5045	495
Grand Total	9930	8550	4740	12275	4110

Table A.10 Percentage of calls abandoned or dropped out

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	41.21%	42.64%	31.12%	27.35%	34.41%
Integral Energy	6.00%	3.19%	8.73%	3.82%	6.04%
EnergyAustralia	10.50%	10.48%	15.75%	10.76%	11.12%
Grand Total	22.99%	25.13%	20.34%	17.36%	22.37%

Table A.11 Percentage of calls answered by a human operator within 30 seconds

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	48.4%	47.2%	0.0%	61.4%	51.4%
Integral Energy	81.0%	89.0%	70.9%	96.2%	92.0%
EnergyAustralia	44.6%	81.3%	74.3%	81.1%	79.7%
Grand Total	52.1%	65.8%	46.2%	74.4%	66.8%

Table A.12 Percentage of complaints by small retail customers about network matters

	2004/05	2005/06	2006/07	2007/08	2008/09
Country Energy	0.3%	0.4%	0.3%	0.4%	0.5%
Integral Energy	0.4%	0.5%	0.4%	0.3%	0.3%
EnergyAustralia	0.1%	0.1%	0.1%	0.1%	0.1%
Grand Total	0.2%	0.3%	0.2%	0.2%	0.2%

Table A.13 Total numbers for all performance indicators

Performance indicators	2004/05	2005/06	2006/07	2007/08	2008/09
Number of customers as at 30 June	3,115,376	3,150,976	3,181,358	3,214,477	3,237,132
Number of residential small retail customers	2,752,529	2,758,229	2,806,201	2,834,295	2,857,092
Number of non residential small retail customers	332,831	372,417	355,591	359,149	358,213
Total small retail customers	3,083,360	3,130,646	3,161,792	3,193,444	3,215,305
Number of calls made to this service	1,219,066	1,231,710	1,302,271	1,129,277	1,088,713
Number of calls abandoned or dropped out	280,247	309,496	264,883	196,047	243,530
Number of calls answered within 30 seconds	634,869	810,131	601,608	840,565	727,489
Number of connections provided by the DNSP	287,960	316,024	243,848	238,022	233,238
Number of connections provided after the agreed date	46	61	38	34	26
Total value of compensation paid for connections after agreed date (\$)	4,080	8,040	5,400	3,840	3,120
Number of planned interruptions to supply	11,886	10,531	9,772	12,694	19,555
Number where insufficient notice was given	424	601	530	550	630
Number interrupted for longer than advised	200	162	152	226	289
Total value of compensation paid for insufficient notice or interruptions lasting longer than advised (\$)	25,675	35,770	37,100	42,360	59,390
Total number of reported street light faults	58,747	53,587	42,669	50,548	44,819
Number of times where repairs were late	2,927	1,693	425	1,200	277
Total value of compensation paid for repair of streetlights (\$)	9,930	8,550	4,740	12,275	4,110
Number of complaints by small retail customers about network matters	6,331	7,382	6,679	6,372	6,796
Number of complaints from residential small retail customers	5,806	6,760	6,085	5,809	6,164
Number of complaints from non residential small retail customers	525	622	594	563	632

B Notes and definitions

B.1 Customers

'Customer' means the person in whose name an electricity account is held under one supply contract.

'Small retail customer' means a customer whose electricity consumption in NSW is no more than 160 megawatt hours per annum.

'Residential small retail customer' means a small retail customer who uses their premises primarily for residential purposes.

'Non-residential small retail customer' means a small retail customer who uses their premises primarily for non-residential purposes.

B.2 Telephone service for reporting network faults

The resulting measures that may be used in IPART's compliance report are:

- ▼ Percentage of calls answered within 30 seconds.
- ▼ Percentage of calls that dropped out or were abandoned by the caller.

These measures are based upon a guaranteed customer service standard established under clause 40 and Schedule 3, Part 2, clause 11 of the *Electricity Supply (General) Regulation 2001*. A connection contract between a distributor and a small retail customer must require a distributor to provide a telephone service that operates on a number to which a person can be connected for not more than the price of a local telephone call and that can receive notice of, and give information concerning, faults and difficulties in the distributors' electricity works. An automated answering service satisfies this requirement only if it makes provision for the transfer of calls to a human operator.

B.3 Timely provision of services

The resulting measures that may be used in IPART's compliance report are:

- ▼ Number of connections not undertaken by the agreed date.
- ▼ Value of compensation paid for not providing connection services by the agreed date.

These measures are based upon a guaranteed customer service standard established under clause 40 and Schedule 3, Part 2, clause 9 of the *Electricity Supply (General) Regulation 2001*. A connection contract between a distributor and a small retail customer must provide that if the distributor fails to provide a connection service

under the contract on or before the date agreed between the distributor and the customer (or the customer's representative) as the date by which the service is to be provided, the distributor is to pay to the customer, by way of compensation for the delay, not less than \$60 for each day that elapses between the agreed date and the date by which the service is actually provided. The contract must provide that the maximum amount payable in relation to any one service is \$300.

B.4 Timely notice of planned interruptions to supply

The resulting measures that may be used in IPART's compliance report are:

- ▼ Number of planned interruptions to supply.
- ▼ Number of planned interruptions to supply where the Licence Holder did not provide the required notice to affected customers.
- ▼ Number of planned interruptions to supply where a Licence Holder interrupted supply longer than indicated in the relevant customer notice.
- ▼ Value of compensation paid to customers for not providing the required notice or for interrupting supply for longer than indicated in the notice.

These measures are based upon a guaranteed customer service standard established under clause 40 and Schedule 3, Part 2, clause 10 of the *Electricity Supply (General) Regulation 2001*. A connection contract between a distributor and a small retail customer must provide that, if the distributor fails to provide to the customer at least 2 business days' notice of any interruption by the distributor to the customer's supply of electricity, or interrupts the customer's supply of electricity for longer than the time indicated in any such notice, the distributor must pay the customer, by way of compensation for the interruption to supply, not less than \$20.

B.5 Repair of faulty street lights

"Average number of days to repair faulty street lights" = Total number of street light repair days/Total number of reported street light faults

The resulting measures that may be used in IPART's compliance report are:

- ▼ Number of reported street light faults.
- ▼ Number of street light repairs that were not completed by the date agreed with the person reporting the fault.
- ▼ Percentage of street light repairs that were not completed by the date agreed with the person reporting the fault.
- ▼ Average number of days to repair faulty street lights.
- ▼ Value of compensation paid to eligible persons for not completing street light repairs by the agreed date.

These measures are based upon a guaranteed customer service standard established under clause 40 and Schedule 3, Part 2, clause 12 of the *Electricity Supply (General) Regulation 2001*. A connection contract between a distributor and a small retail customer must provide that, if the distributor fails to repair faulty street lighting on or before the date agreed between the customer and the distributor as the date by which the repair is to be completed, the distributor must pay to the customer, by way of compensation for the loss of illumination, not less than \$15.

This standard applies to street lighting that is owned by the distributor or that the distributor is under a legally enforceable obligation to maintain, but does not apply to street lighting to which the distributor merely supplies electricity or connection services. It also only applies in respect of the customer if the customer's premises abut the part of the street that (but for the fault) would ordinarily be illuminated by the street lighting.

B.6 Complaints

“Complaint” means a written or verbal expression of dissatisfaction about an action, a proposed action, or a failure to act by a Licence Holder, its employees, agents or contractors. This includes failure by a Licence Holder to observe its published or agreed practices or procedures. It does not include a complaint made about the Licence Holder to any other body.

The resulting measures that may be used in IPART's compliance report are:

- ▼ Proportion of residential small retail customers that complained about distribution network service matters.
- ▼ Proportion of non-residential small retail customers that complained about distribution network service matters.

IPART will seek information from EWON on the number of small retail customers who took their complaint about a distributor's service to EWON.

