

Thank you for the opportunity to review and provide comment on the above mentioned Issues Paper.

TXU congratulates IPART on the conduct of this review and the direction IPART is taking these issues.

TXU believes that a strong national energy market requires all Jurisdictions to commit to synergising applicable energy market legislation and regulation. TXU is encouraged that this appears to be a goal of IPART in this review.

Specifically the following comments are offered to assist **IPART** in completing this review:

### **3.3 Problems with current arrangements.**

TXU concurs that it is currently not the practice of **DNSPs** to fix appointment times with customers. TXU would like to see the fixing of appointment times between customers and **DNBP** representatives become industry practice.

#### **4.1 What Aspects of Service Quality should be measured?**

It is TXU's view that all three aspects of service quality (service reliability, quality of supply and customer service) should be reflected in **GCSS** and operating statistics arrangements. Synergy with current Victorian arrangements is recommended.

#### **4.2 Which aspects should be measured as GCSS and which as operating statistics?**

TXU agrees that it is imperative that **GCSS** and operating statistics should not encourage perverse incentives. Operating statistics should be applied at customer class level and not associated with individual customers. TXU believes that it is appropriate for IPART to publish operating statistics for participating Retail companies without imposing **GCSS**. Synergy with current Victorian arrangements is recommended.

#### **4.3.3 What is measured in other jurisdictions? (Customer service).**

TXU supports synergising with current Victorian arrangements. Further TXU believes that it is appropriate to monitor and statistically report erroneous transfers without applying compensation payments.

4.4 How can GCSS and operating statistics best reflect customer preferences and reasonable expectations?

TXU recommends that IPART survey NSW energy customers to inform choice of measures for GCSS and operating statistics. TXU believes that Retailers, DNSPs and consumer groups can assist IPART to development such a survey.

4.5 Are robust data available to measure service quality?

TXU believes it is appropriate to incentivise DNSPs to improve data quality. This should include rewarding positive results and punishing poor results.

4.6 Should the arrangements include provisions to exclude the impact of events outside the utility's control?

TXU recommends synergising with current Victorian arrangements.

5. At what level should standards be set?

TXU believes that targets should get progressively harder to encourage continuing improvement. Standard levels should be different between customer classes and rural/urban areas to reflect their respective needs and expectations. Standards also need to reflect the different exposures applicable to gas and electricity supplies.

6. When should compensation be payable?

Compensation should be paid to individual customers. Synergy with current Victorian arrangements is recommended.

6.1 What level of compensation should be payable?

Synergy with current Victorian arrangements is recommended.

6.2 How should compensation be paid?

TXU believes that compensation should be paid automatically by the regulated company following a breach of service standard. Synergy with current Victorian arrangements is recommended.

7. How often should operating statistics be published?

TXU believes operating statistics should be published on a quarterly basis.

Should you wish to discuss any of the comments above, please do not hesitate to contact me.

Regards,

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TXU