

Mr Warwick Anderson
General Manager, Networks Finance and Reporting
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

25 April, 2018

Dear Mr Anderson

Re: QDN Response to the Australian Energy Regulator's Issues Paper: Queensland Electricity Distributors' Tariff Structure Statements

Queenslanders with Disability Network (QDN) welcomes the opportunity to make a brief submission to the Australian Energy Regulator's Issues Paper: Queensland Electricity Distributors' Tariff Structure Statements.

QDN is an organisation of, for, and with people with disability with over 2000 members and supporters. QDN operates a state-wide network of members who provide information, feedback and views from the lived experience of people with disability to inform systemic policy feedback to Government and peak bodies. QDN also provides information and referral support to people with disability. QDN's submission is reflective of the views of our members.

In making our submission, QDN acknowledges the work of QCOSS and endorses their submission and recommendations on the issues paper. QDN works with QCOSS as a collaborative partner in the affordable energy space.

People with disability need access to affordable energy as an essential service. People with disability face increased challenges in relation to energy, particularly:

- Being reliant on constant energy supply for life-saving equipment, heating and cooling purposes, and to keep assistive technology (wheelchairs, hoists and IT) reliably charged and functioning
- Needing accessible information on being energy-wise consumers, understanding their bill, unbiased information on competitive retailers and understanding information on tariffs, subsidies and concessions
- Facing increased heating and cooling costs due to living in homes that are open planned with universal design features

- Being reliant on in-home support services that assist with activities of daily living (meal preparation, showering, domestic cleaning) in peak energy periods
- Being at increased risk of being unable to pay their energy bills and experiencing energy supply disconnections due to:
 - experiencing financial hardship due to being on low, fixed incomes and the increased costs of living
 - generally rating low on the Digital Inclusion Index and being seen as having low digital access and digital literacy and therefore, being disadvantaged in the majority of engagement with information, including payment options and online discounts
 - being unaware of how to negotiate with retailers and others to seek extensions, waivers, or emergency relief

Regarding the tariff proposals, QDN believes more analysis is needed to identify who will be adversely impacted under these price structures. QDN notes that Energy Queensland has not undertaken trials or more in-depth analysis/ modelling of customer impacts. QDN and other consumer groups have found it challenging to provide informed feedback on the tariff proposals and provide accessible information to our members to inform and protect the people who may be negatively affected by these changes without understanding the customer impacts. QDN recommends that trials must be conducted with a diverse spread of consumers, including people with disability.

QDN supports QCOSS' assertion that tariff design should consider the principles of equity, simplicity and bill stability and that affordability and access to electricity services are essential components of equity in tariff design. QDN is concerned that in the proposed tariffs:

- **The Residential Basic Tariff** does not achieve affordability for large users (including vulnerable people with medical devices or large families) and for people living in embedded networks (including low-income and social housing). QDN is also concerned about the impacts for people living in group homes or large congregate care facilities
- **The Residential Demand and Capacity Tariffs** are complex tariffs that consumers will struggle to understand and respond to, and risk bill shock and potential disconnections to power supply due to being unable to afford to pay their energy bill.

QDN believes Energy Queensland needs to provide a clear plan for how they will communicate and educate customers about the new tariffs. The tariffs are complex, and it is likely that many customers will find them difficult to understand and accept. QDN also believes there needs to be 'safety net' strategies identified for customers who may be worse off under the tariff reforms.

At this stage, QDN requires more information to understand the impact of the proposed tariffs on Queenslanders with disability to be able to make an informed decision to be able to endorse the proposals. QDN recommends that Energy Queensland undertake more analysis on the impacts of the proposed tariffs on vulnerable consumers, develop a clear plan for how they will communicate and educate customers about the new tariffs, including appropriate measures for consumers experiencing vulnerability due to disability or economic disadvantage.

QDN supports the equity measures put forward in the QCOSS submission to be an adjunct of tariff reform, particularly a move to percentage-based concessions to protect consumers from energy bill shock, steps to improve energy efficiency standards in public and community housing properties and a dedicated focus on co-designed consumer education and support programs delivered by peer-lead organisations to assist people who are struggling to pay their energy bills and understand the new tariffs.

Thank you for the opportunity to provide this brief submission. If you have any further questions, please call QDN on 1300 363 783.

Yours sincerely



Paige Armstrong

Chief Executive Officer