

19 May 2006

Dr John Tamblyn
Chairman
Australian Energy Market Commission
By email to submissions@aemc.gov.au

Dear Dr Tamblyn

The Consumer Utilities Advocacy Centre Ltd (CUAC) welcomes the opportunity to comment on the draft Rule determination in relation to the proposed National Electricity Amendment (Advocacy Panel) Rule 2006.

CUAC is an independent consumer advocacy organisation, established to ensure the interests of Victorian electricity, gas and water consumers, particularly low-income, disadvantaged and rural consumers, are effectively represented in the policy and regulatory debate.

CUAC strongly endorses the Commission's statement that "the continuation of the Panel, with improved governance and accountability through this draft Rule, will contribute to the long term interests of end users" (p 7). We also welcome the recognition that capacity-building – particularly when delivered through a grant-making mechanism such as the Advocacy Panel – is rarely a process that yields immediate results and that time will demonstrate the value of such investment to Australian consumers.

CUAC generally supports the Commission's approach and proposed draft Rule, and have no particular comments upon the changes made to the Panel's operating procedures. We endorse the Commission's approach to the appointment of Panel members, and particularly welcome the Commission's decision to have regard to the *Principles for the Appointment of Consumer Representatives: a Process for Government and Industry* in formulating these guidelines. However, it is unclear how the Commission would consult with consumer groups in developing the criteria for appointment to the Panel, and we would recommend that stakeholders are provided the opportunity to comment on the draft guidelines.

While CUAC understands the Commission's reasoning that it should not include a focus on the interests of small and medium end users within this particular process, we will be separately approaching the Ministerial Council on Energy to ask its members to request that

Panel members incorporate that intent into their deliberations. We will be making similar representations to ensure the funding criteria are in alignment with the NEM objective, and so enable advocacy to support sustainable energy policies and programs - clearly in the long-term interests of consumers.

Please do not hesitate to contact me on 03 9639 7600 should you have any questions about this submission.

Yours sincerely

Kerry Connors
Executive Officer