




AUSTRALIAN CHAMBER OF  
COMMERCE AND INDUSTRY



ACCI SUBMISSION TO  
REVIEW OF ELECTRICITY  
CUSTOMER SWITCHING  
ISSUES PAPER

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**Canberra Office**

COMMERCE HOUSE  
Level 3, 24 Brisbane Avenue  
Barton ACT 2600

PO BOX 6005 Kingston,  
ACT 2604 AUSTRALIA

T: 02 6273 2311  
F: 02 6273 3286  
E: [info@acci.asn.au](mailto:info@acci.asn.au)

**Melbourne Office**

Level 3, 486 Albert Street  
East Melbourne VIC 3002

PO BOX 18008  
Collins Street East  
Melbourne VIC 8003  
AUSTRALIA

T: 03 9668 9950  
F: 03 9668 9958  
E: [melb@acci.asn.au](mailto:melb@acci.asn.au)

W: [www.acci.asn.au](http://www.acci.asn.au)

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# 1. EXECUTIVE SUMMARY

The ability for business consumers, especially small business, to switch electricity retailer is one of the important aspects of participating in the competitive market, providing as it does, access to competing electricity supply offers, including price, better service, and more innovative products. It also engenders customer confidence in the electricity retail market. ACCI therefore welcomes the review which the Australian Energy Market Commission (AEMC) is conducting of impediments to customers switching of their electricity retailer in the National Electricity Market (NEM) and the opportunity to provide a submission to the review.

ACCI speaks on behalf of Australian business at a national and international level. Australia's largest and most representative business advocate, ACCI develops and advocates policies that are in the best interests of Australian business, economy and community. We achieve this through the collaborative action of our national member network and the leadership we provide for more than 300,000 businesses.

Electricity and gas are significant inputs into many Australian businesses. They represent an important cost of business and businesses rely on energy to produce goods and services for the domestic market or export. Maintaining our competitive advantage in energy is an important strategic economic and business goal. ACCI has serious concerns about how this will be done, particularly given the recent large increases in electricity and gas prices.

This review represents an opportunity – a modest but nevertheless still important one – to help preserve this strategic advantage by ensuring that switching retailer is efficient, timely, comes at minimum cost and supports the competitive reforms introduced into our electricity sector nearly 20 years ago.

ACCI has considered the matters raised in the AEMC Issues Paper and other relevant material in putting together this submission and has come to the conclusion that the current approach to customer switching would benefit from a range of reforms.

The existing approach, whilst it has worked and been part of very active customer switching in the NEM, with rates of around 20 per cent per annum usual in some States, can take too long (and too often does), contains unnecessary restrictions, imposes unnecessary costs (on customers and retailers) and is seen as a significant impediment to switching by small business.

The maximum time allowed to switch retailer in most parts of the NEM is also excessive, with the NEM allowing the longest time to switch retailer of all those countries compared in the Issues Paper. It is also likely that actual times taken to



switch retailer in the NEM overall, are higher than for many of these countries.

It is also relevant that other countries including Sweden, New Zealand and Great Britain have recently taken, or are taking steps, to reform the switching processes with the effect of, or with a view to, significantly reducing these times. This puts more pressure on Australia to follow suit or risk falling further behind. It also offers potentially important lessons from which Australia could learn about what steps to take to improve our switching processes.

ACCI has recommended a range of measures for consideration by the AEMC that we believe would allow business, especially small business, to enjoy the benefits of a better switching process and one that matches our desire to see that switching is efficient, timely, comes at minimum cost and supports our competitive electricity reforms. They will also support ACCI's desire to see a reduction in the burden of regulation on small business, or else ensure that such regulation is improved and better supports small business as a generator of growth, investment and jobs in the economy.

The reforms we have proposed include the following:

- The multiple regulatory instruments that exist should not impede switching, especially for smaller consumers, by creating confusion and a lack of understanding.
- Jurisdictional differences in Victoria and Queensland should not impede switching or add to its costs. Moves to national arrangements should be on a best practice basis.
- The AEMC should propose a significant reduction in the current permitted maximum switching time of 65 days.
- Retailers being required to place NMI (meter identifiers) information clearly on bills.
- Consideration of the impact of mandated cooling off periods on switching times and possible reform options such as making these shorter or more flexible.
- We support a range of options to reduce delays in switching caused by meter reading, such as separating meter reads from switching, and making greater use of retailer or customer self-read options and of estimated reads.
- Currently parties can raise a range of objections to customer switching, which



can delay or even stop the process. ACCI finds that these can be outdated and act as an impediment to competition. Those objections that have no bearing on a customer transfer should not be allowed, those objections related to errors should be corrected expeditiously and timeframes related to objections should be reduced, the 20 day period to resolve objections should be shortened and customers should be expeditiously notified of any objections and of their nature.

- ACCI supports a well-structured, cost effective and competitively based roll out of smart meters as this will support more efficient and effective customer switching.
- ACCI therefore supports the contestable and open access approach to metering services adopted by the Standing Council on Energy and Resources (SCER).
- The currently limited introduction of smart meters outside Victoria means that the adoption of rules and processes by the AEMC that facilitate customer switching will be more important to improved switching in the interim than new metering technology.
- The AEMC should examine what impact the Victorian monopoly approach to smart metering has had on switching, not just relative to other states, but also relative to the competitive method favoured by SCER and the AEMC.
- There are a range of developments in Sweden, New Zealand and Great Britain to facilitate switching that should be considered for introduction into the NEM (e.g., more frequent meter reads, shorter maximum transfer times, displaying meter numbers on all bills, shorter time limits on transfer processes, removal of or limitations on the use of objections to stop transfers, greater use of estimated meter reads).
- The AEMC should add comparisons of switching in other industries to its considerations (e.g., gas, banking, insurance and telecommunications).
- ACCI believes that a more holistic assessment of the impediments to customer switching in the NEM is called for in this review than the AEMC propose.



## 2. ABOUT ACCI

### 2.1 Who We Are

The Australian Chamber of Commerce and Industry (ACCI) speaks on behalf of Australian business at a national and international level.

Australia's largest and most representative business advocate, ACCI develops and advocates policies that are in the best interests of Australian business, economy and community.

We achieve this through the collaborative action of our national member network which comprises:

- All state and territory chambers of commerce
- 27 national industry associations
- Bilateral and multilateral business organisations

In this way, ACCI provides leadership for more than 350,000 businesses which:

- Operate in all industry sectors
- Includes small, medium and large businesses
- Are located throughout metropolitan and regional Australia

### 2.2 What We Do

ACCI takes a leading role in advocating the views of Australian business to public policy decision makers and influencers including:

- Federal Government Ministers & Shadow Ministers
- Federal Parliamentarians
- Policy Advisors
- Commonwealth Public Servants
- Regulatory Authorities
- Federal Government Agencies

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.





Our specific activities include:

- Representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally;
- Business representation on a range of statutory and business boards and committees;
- Representing business in national forums including the Fair Work Commission, Safe Work Australia and many other bodies associated with economics, taxation, sustainability, small business, superannuation, employment, education and training, migration, trade, workplace relations and occupational health and safety;
- Representing business in international and global forums including the International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, Confederation of Asia-Pacific Chambers of Commerce and Industry and Confederation of Asia-Pacific Employers;
- Research and policy development on issues concerning Australian business;
- The publication of leading business surveys and other information products; and
- Providing forums for collective discussion amongst businesses on matters of law and policy.



### 3. INTRODUCTION

This submission responds to the Australian Energy Market Commission's (AEMC) Issues Paper for its Review of Electricity Retail Switching. It sets out the Australian Chamber of Commerce and Industry's (ACCI) position in relation to switching by customers of their electricity retailer and responds to matters raised in the Issues Paper. ACCI welcomes the AEMC's review and the opportunity to provide a submission on the Issues Paper.

Electricity and gas are significant inputs into many Australian businesses. They represent an important cost of business and our businesses rely on energy to produce goods and services for the domestic market or for export. ACCI recognises the importance of competitively priced energy to support a healthy economy and the international competitiveness of our industries, be they export or import competing ones. Our abundant supplies of energy have been – and need to remain – a lynchpin to support our international competitiveness.

ACCI has been a strong supporter of an efficient and productive energy supply chain, importantly including the reforms to both electricity and gas which were based on efficiency and competition. Where competition and efficiency have been vigorously pursued, the reforms have delivered benefits to energy consumers, including business. However, where these objectives have been compromised, which unfortunately has sometimes been the case, Australian businesses have been penalised.

ACCI has been especially concerned about the large increases in both electricity and gas prices seen throughout Australia in recent years driven, in large part, by failures to pursue further pro-competitive and productivity enhancing reforms vigorously enough. We are pleased to see that this has been recognised by Governments and that there is now evidence that some of the contributing problems are being addressed. ACCI is keen to be involved in and support such measures, as well as to advocate for their broadening.

Rapidly rising energy prices have been a major burden on Australian business and have contributed to erosion in their cost competitiveness, leading to the demise of some. The concerns of business, including small and medium enterprises (SMEs), are manifest in many of our business surveys, which consistently show that the rapid escalation in energy prices is one of the top issues facing Australian business. Small business has some particular characteristics which have a bearing on its interaction with energy markets:

- It often faces intense competition, both at home and abroad, and so has



difficulty passing on cost increases such as those seen in energy in recent years. When those cost increases reflect inefficiencies, poor policy and regulation, poor productivity and constraints on competition, as they often have in recent years, the burden felt by SMEs is even more debilitating, ultimately sapping the ability of small businesses to sustain themselves, invest, grow and create jobs.

- Notwithstanding the introduction of competition, our energy markets are characterised by a labyrinth of extensive and complex regulation. As well as being a burden on small business, this also has the unfortunate consequence of disengaging small business from the energy market and from advocacy. Small businesses are focused especially on running their business and have very limited time or resources to spend on dealing with red tape, or influencing policy and regulation. An unfortunate consequence is that their needs can get overlooked in decision making. ACCI would therefore like to see a simplification of regulation in energy markets and, where it exists, that regulation should be used to support competition and efficiency. This also applies to this review.

The next section (4) covers ACCI's position in relation to customer switching in the National Electricity Market (NEM). This is followed in section 5 with our responses to matters raised in the AEMC's Issues Paper. Finally, section 6 sets out our conclusions and recommendations for the AEMC review.

## 4. CUSTOMER SWITCHING IN THE NEM

ACCI strongly supports the reforms to our energy markets, including the establishment of the NEM and particularly the introduction of competition and customer choice. There can be little doubt that customers have benefited from this, including by being able to gain access to a competitive price for their electricity.

The business community believe that the ability of customers, including business customers, to switch retailer (i.e., choose who they buy their electricity from), is central to a competitive electricity market, to customers being able to gain benefits from such a market and to customers having confidence in the competitive market.

As the AEMC says:

*Switching is the most powerful tool customers have available for exerting their influence on the competitive process.<sup>1</sup>*

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<sup>1</sup> AEMC, *Review of Electricity Customer Switching: Issues Paper*, December 2013, page 13.



On the other hand, problems encountered in switching retailer are likely to have the opposite effect. This would include a lack of competition, barriers to switching, delays in switching and problems in the switching process.

Efficiency and a lack of impediments to switching electricity retailer are particularly important to SMEs, given their limited resources and time for decision-making, their limited knowledge of electricity markets, their need for access to competitively priced electricity and their ability to benefit from improved electricity retail services. Their position is more vulnerable than, for example, large energy users who have more resources, time and knowledge of electricity markets.

ACCI submits that customer switching in the NEM would be most beneficial to the needs of business, especially SMEs, if it were characterised by:

- Access to a healthy range of retailers to choose from who compete vigorously;
- An efficient and low cost switching process;
- A process that is completed quickly so that customers can gain quick access to competitive offers;
- A process that is relatively error free and one where, if errors do occur, they do not prevent or unduly delay customer switching;
- A process that is relatively simple and easy for smaller customers to understand and deal with, as well as one, where regulation is kept to a minimum; and
- A process that allows customers to raise any grievances efficiently and effectively.

Table 1 provides our assessment of the current process against each of these points.



**Table 1: ACCI's Assessment of Customer Switching in the NEM**

Criteria	ACCI Assessment
<b>Retailer choice</b>	<ul style="list-style-type: none"> <li>The number of retailers that customers have to choose from is healthy in NSW, Vic and Qld, although these markets are dominated by three retailers. There is less choice in SA and the ACT, though the level is acceptable. Tasmania offers very limited choice and small consumers have no choice.</li> <li>National licensing and regulation of retailers will lower barriers to entry. Vic and Qld are yet to adopt.</li> <li>Vertical integration of retailers (with generators) can place limits on retail competition (e.g. be a barrier to entry for stand-alone retailers).</li> <li>While standing offer discounts of 10-20+ percent can be obtained in some markets (e.g. Vic, NSW), there is also evidence that retail margins are high.<sup>2</sup></li> <li>Retailers appear to offer limited innovation in services that customer's value. They lag behind other markets.</li> </ul>
<b>Efficient &amp; low cost switching</b>	<ul style="list-style-type: none"> <li>Some aspects of the process appear to be efficient and reasonably low cost.</li> <li>However, there are exceptions to this and improvements in these areas could be made with benefits to customers, including SMEs (see our comments in the next section).</li> </ul>
<b>Speed of switching</b>	<ul style="list-style-type: none"> <li>Excessive customer switching times, both absolutely and relative to other countries/industries, seem to be one area in need of improvement based on information presented in the Issues Paper.</li> <li>As the AEMC points out, this can have a negative impact on customers and their confidence in the process.</li> <li>We offer our comments on how to speed up the process in the next section.</li> </ul>
<b>Free of error</b>	<ul style="list-style-type: none"> <li>There appears to have been a significant increase in the errors occurring in the switching process, even allowing for the increased number of transfers, with error related objections rising from less than 1,000 per month in 2010 to 4,000 more recently. Date and meter related problems are the cause.</li> <li>As well as creating delays in switching, this could worsen customer experience in the switching process.</li> </ul>
<b>Simple and easy</b>	<ul style="list-style-type: none"> <li>There is evidence that switching retailer is not considered to be simple and easy by customers. An examination of the process suggests that smaller customers can find aspects of switching daunting and difficult to understand.</li> <li>The Roy Morgan survey for the AEMC<sup>3</sup> also shows that many small businesses who had not switched retailer said that this was due to reasons related to a process that was neither simple nor easy.</li> </ul>
<b>Grievances</b>	<ul style="list-style-type: none"> <li>Grievances and complaints can be taken to the retailer itself and State energy Ombudsmen.</li> <li>ACCI has limited information about the usefulness and efficiency of these grievance avenues.</li> </ul>

<sup>2</sup> See SKM, *Analysis of Electricity Retail Prices and Retail Margins 2006 – 2012: Report for the Essential Services Commission*, May 2103.

<sup>3</sup> Roy Morgan Research, *Survey of Business Customers of Electricity and Natural Gas in New South Wales: Effectiveness of Retail Competition*, Prepared for Australian Energy Market Commission (AEMC), February 28, 2013.



## 5. COMMENTS ON AEMC ISSUES PAPER

### 5.1 Overview

This section responds mainly to matters raised in the AEMC's Issues Paper. We note that the AEMC's review focuses on smaller customers, including small business, and have structured our comments accordingly.

ACCI wishes to acknowledge the AEMC's efforts in producing a clear and well thought out Issues Paper and also its analysis of information and data related to customer switching.

### 5.2 International Comparisons

We note with some concern that Australia is the worst performer in terms of having the longest allowed time for customer switching among the group of countries shown in Figure 1.1 of the Issues Paper. Moreover, our time of 65 business days is more than double the average of around 30 days. Although the AEMC points out that there may be data and measurement differences across countries, which could mean that Australia's actual position of 20-30 days to switch is not as bad as shown by its maximum switching time, we consider that it is likely that, even allowing for this, our position is still fall well short of 'best practice'.

It is also relevant that information in the Issues Paper (Appendix B) clearly shows that a number of countries have moved, or are about to move, to reform their customer switching arrangements to further reduce significantly the time taken to switch. If Australia does not make improvements to its arrangements, then it is likely to fall further behind internationally.

ACCI believes that the time taken to switch retailer in the NEM ought to be reduced significantly to bring it as close as possible to international best practice in as short a time as possible. Helping to achieve this ought to be a key objective of the AEMC's review. We note recent comments reported in the Issues Paper by the British Secretary of State for Energy and Climate Change that he wishes to see the transfer process being completed in 24 hours.

Supporters of the NEM, including jurisdictional Governments and NEM agencies, often refer to it as one of the best electricity markets in the world. Whilst there is no doubt that reform of the NEM has had its share of success, the length of time



allowed for switching and the actual time taken to do so is not consistent with a 'world best' market.

## 5.3 Comparisons with Other Industries

The AEMC Issues Paper does not provide any comparisons with other industries in terms of switching processes or the time taken to do so. However, this also provides a relevant benchmark with which to compare the NEM and as a source of potential lessons for improvement. We would encourage the AEMC to consider adding this to its review.

Some relevant industries could be examined on the basis that they have similar characteristics to electricity, are retail in nature or have undergone reform and deregulation. They could include, for example:

- Gas;
- Banking;
- Insurance; and
- Telecommunications.

We understand that it is much simpler and faster for small business to switch supplier in relation to the latter three industries, although switching is not without its complications.

## 5.4 Scope and Purpose of the Review

ACCI supports the purpose of the review and the inclusion of those issues which the AEMC has identified. These are important to the AEMC developing its understanding of the impediments to switching and the steps needed to improve the current processes.

However, we believe that the review is too limited in its scope. Whilst we appreciate that the background to the review, namely the AEMC's Power of Choice review, may have had an impact on defining its scope and recognise the AEMC's role as the 'rule maker' in the NEM, we nevertheless believe that a more holistic assessment of the impediments to customer switching in the NEM was called for.



In this regard, we note the AEMC's comment in the Issues Paper recognising the broader scope of customer switching. We are concerned that the limited focus for the review as interpreted by the AEMC could mean that it does not include consideration of potentially important issues that act as impediments to switching therefore limiting the purpose of the review, which is to remove barriers to switching.<sup>4</sup>

In particular, we would refer to the following matters which we believe should be considered:

- Steps 1 (customer decision to switch), Step 2 (actual switch), Step 4 (billing and market settlement) and Step 5 (completion of the transfer and hand over), as well as Step 3 (the MSATS process), which the AEMC proposes be the focus of the review.
- New connections and change of address issues involving switching.
- All aspects of metering (so far as they relate to switching).
- Consumer protections that relate to switching, such as cooling off periods.

## 5.5 Assessment Framework

ACCI supports the AEMC's framework for undertaking this review. We particularly support:

- Use of the National Electricity Objective (NEO), which seeks to safeguard the long term interests of electricity consumers, as the review's overarching reference point.
- Reference to productive, allocative and dynamic efficiency in the assessment of issues and to guide the AEMC's decision making.
- The use of the six criteria listed in the Issues Paper to assess the efficiency of the transfer process. We also believe that the interests of consumers should be paramount in the AEMC's decision making. Each criterion is addressed below.

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<sup>4</sup> We note that the Terms of Reference also say that the AEMC "should also give consideration to other factors and processes associated with consumer switching".





### 5.5.1 Transparency

We support the need for transparency by all parties concerned in retail switching as this promotes accountability and confidence in the retail market. It also ensures that smaller customers are well informed and can make a more informed choice to switch.

### 5.5.2 Clarity and Simplicity

ACCI also supports the need for the switching process to be clear and simple as this will encourage entry into the retail market, support the competitive process and the benefits it provides to customers, result in fewer switching errors and encourage greater market efficiency. This should also support the small business need for less regulation.

### 5.5.3 Efficient Incentives

We further support the need for the switching process to provide incentives to all parties involved to provide relevant, accurate, consistent and timely information, especially given that problems in these areas slow down switching and lead to poor customer experiences and a loss of confidence in the retail market.

### 5.5.4 Efficient Allocation of Risks and Costs

We agree that it is important that costs and risks associated with switching should be allocated to those best placed to manage them. We would also point out that this will often mean that costs and risks should be borne by parties other than the customer, especially as smaller customers are often least well placed to manage the costs and risks associated with switching given their relative lack of skills, knowledge and resources.

### 5.5.5 Predictability

Certainty in how switching rules and processes are framed and applied will enhance predictability and encourage switching by, for example, enabling retailers and customers to be more confident about switching processes.



## 5.5.6 Minimising Regulatory and Administrative Burden

We strongly agree with the AEMC's comment that "rules should not be overly burdensome, complex or duplicative"<sup>5</sup>. An important priority for ACCI is to reduce the amount of business regulation, especially as it affects small business.

Complex and burdensome rules will act as a disincentive to switching for both retailers and smaller customers. They will also act as a barrier to entry into electricity retailing and increase the costs of switching. For small business, such rules are important in terms of their ability and willingness to exercise choice in electricity markets.

It is therefore important that the costs of switching regulations are not greater than the benefits.

## 5.6 Issues Related to the Switching Process

Our comments below focus on a range of issues with application to small business raised in the AEMC's Issues Paper.

### 5.6.1 Multiple Instruments of Regulation

ACCI notes that the NEM contains multiple regulatory instruments which impact on switching (e.g. National Electricity Rules, National Energy Retail Rules, MSATS procedures, Metrology Procedures and Service Level Procedures). We also note that these sometimes provide limited guidance on customer transfers. The AEMC should ensure that these multiple instruments do not impede the process of switching, especially for smaller consumers, by creating confusion and a lack of understanding.

### 5.6.2 Jurisdictional Arrangements

We note that Victoria and Queensland operate separate regulatory arrangements for switching and also the AEMC's comments indicating that differences between these and the national arrangements are limited. Nevertheless, to the extent that there are differences, the AEMC should ensure that they do not impede switching or add

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<sup>5</sup> AEMC, *Issues Paper*, page 17.



to its costs. Even though differences may be limited, the mere fact that there are different arrangements may impede switching, for example, by making retailers comply with different instruments.

Nevertheless, it is also possible that aspects of the jurisdictional arrangements are preferable to those in the NEM. For example, the shorter maximum period of 20 business days for transfers to be completed in Victoria seems preferable to the longer time specified in the Customer Administration and Transfer Solution (CATS) procedure. The AEMC should therefore ensure that any move to national arrangements in Victoria and Queensland is done on a best practice basis.

### 5.6.3 Maximum and Average Switching Times

NEM switching procedures currently specify a maximum 65 business day prospective timeframe for customer transfers. It is apparent from Figure 1.1 of the Issues Paper that this is the longest allowed switching time for all countries shown. Even allowing for factors mentioned in the Issues Paper which could make the comparisons less than perfect, it is still unlikely that Australia would be near best practice in terms of the average time taken for customer transfers.

It is also relevant that the Issues Paper (Attachment B) outlines that a number of other countries have moved, or are moving, to reduce maximum allowed switching times. ACCI believes that the NEM should follow suit and that the AEMC therefore needs to propose a significant reduction in the current maximum switching time permitted.

There are number of factors which support this:

- Many other countries have significantly lower maximums;
- It will act as an incentive for retailers and other involved parties to respond more quickly and develop mechanisms to support faster switching;
- The average time taken to switch of some 20-30 days is less than half the maximum;
- It would be likely to lower the average time taken to switch;
- The switching process has been in place in most parts of the NEM for a significant period of time, is mature and parties are familiar with it; and



- The process is largely automated and therefore amenable to being sped up.

The AEMC should also consider the range of factors which can impact switching times and whether these can be altered in order to assist with lowering maximum, and average, switching times. This includes cooling off periods, access to National Meter Identifier (NMI) numbers, time periods allowed to undertake the various procedures involved in switching and the like. We comment further on some of these below.

## 5.6.4 Access to NMI Information

It is apparent that ease of access to the NMI can facilitate faster switching. For example, the AEMC says in its Issues Paper that:

*We understand that in some cases, this process can be expedited where the customer has access to their NMI, such as on a recent electricity bill.<sup>6</sup>*

It is our understanding that not all retailers put this information on bills or that it can be difficult to find. It would seem desirable that all retailers place this information clearly on their bills and that they be required to do so as this will facilitate switching.

The accuracy of this information would also be improved if it were placed on bills, thus reducing the likelihood of errors which can also delay switching.

## 5.6.5 Cooling Off Period

A mandated cooling off period of 10 business days commences once a customer receives all information relevant to a contract. ACCI acknowledges that this can be an important safeguard to allow smaller customers to reconsider their decisions to change retailer without pressure and allow them to more carefully examine their decision. Nevertheless, it can delay switching time and the AEMC review ought to consider this aspect, notwithstanding its decision to place this issue outside the scope of the review. It may be that an examination of cooling off periods will support some relaxation of existing regulations or that it will unearth ways to add flexibility to cooling off provisions and how they impact on switching times.

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<sup>6</sup> AEMC, *Issues Paper*, page 33.



It would also be helpful in terms of this review supporting improvements to customer switching if the AEMC could examine the extent to which cooling off periods actually give rise to customers reconsidering their decision to switch retailer. For example, if the cooling off period does not often lead to a change in decision, it may further support a relaxation in current requirements or increased flexibility.

The Issues Paper also says that retailers may initiate transfer procedures during the cooling off period but that the AEMC understands that, in general, they do not do so in order to avoid costs associated with reversals where the customer cools off. It would be helpful for the AEMC to explore the complications of reversals and their costs in more detail with retailers to determine how significant they are. It is also possible that the greater use of advanced metering will reduce some of these complications and their costs.

## 5.6.6 Meter Reading Issues

It is apparent from the Issues Paper that meter reading issues can contribute to delays in customer switching. This appears to apply particularly to situations where the transfer process is not completed until the next scheduled read date which may be up to 65 business days away. However, it is also apparent that some retailers adopt processes which avoid long delays by opting for a special meter read and may also absorb the costs of this.

ACCI would support a range of options to reduce delays in switching caused by meter reading issues such as:

- Removing the meter reading process from switching so that it takes place separately and does not create delay. In our view, there should be sufficient confidence in the market and switching processes by now, as well as B2B processes, to allow this to occur. In an efficiently operating market, a customer swapping retailer should not be dependent on reconciliations between winning and losing retailers.
- Making greater use of retailer or customer self-read options, e.g., by taking a digital picture of the meter.
- Greater use of estimated reads to facilitate the transfer process with a full reconciliation to follow at a later date. We note that estimates appear to be more widely used in some other countries.



It would also be useful for the AEMC to analyse data on what contribution to delays in switching meter reading issues make and we support its intention to contact retailers about a range of meter reading issues.

## 5.6.7 Objections to Customer Transfers

The Issues Paper outlines a range of objections that can be lodged to customer transfers, who can lodge them and the timeframe for these. The Issues Paper notes that objections relate mainly to technical issues. It is clear that objections can delay customer transfers.

ACCI has the following comments on the objections process:

- Objections that have no bearing on a customer transfer should not be allowed. It may be possible to separate some reasons for objections from the transfer process so that they do not delay switching but are handled outside of this process on a party to party basis. For example, objections related to debt should be handled in this way, objections related to early termination of contracts ought to be excluded as they limit the exercise of customer choice and contracts are subject to early termination penalties. We also note that adopting more flexible and timely approaches to meter reads, such as those discussed in section 5.5.6 above, would also limit delays associated with some types of objection.
- Where objections relate to errors made by one party or another, there ought to be an obligation on the party who made the error to correct it expeditiously.
- Timeframes related to the objections process ought to be kept as short as possible and should reflect the ability of the source of the objection to be resolved as quickly as possible.
- Allowing 20 days to resolve objections seems to be excessively long for simple objections which can be solved in a much shorter time. Even allowing for the fact that parties may well resolve many objections in less time than this, there ought to be a stronger incentive on them to do so by shortening the time allowed.
- It should also be a requirement that customers are notified of any objections in an expeditious way and of the nature of the objection.



## 5.7 AEMC Analysis of Actual Customer Switching Experience

We comment below on the AEMC's analysis of customer switching times.

### 5.7.1 The Small Business Experience

The Issues Paper summarises the experiences of household consumers in NSW with switching using the results of a survey conducted by Roy Morgan Research. However, Roy Morgan also conducted a similar survey of small business experience with switching in NSW, the results of which are not reported in the Issues Paper. This shows some differences compared to the results for households.

We highlight some of the results below:

- 21 per cent of businesses surveyed said that a concern with the switching process was the reason they did not switch supplier (11 per cent for households).
- This was equal fourth as the most common reason for not switching (7th for households).
- There were other commonly expressed reasons why businesses did not switch which are of interest to this review. These are:
  - *Couldn't be bothered/too much effort* was mentioned by 29 per cent of businesses (the 2nd most common reason).
  - *Info. Too Complex/Too Much Effort To Sort Through/ Too Much To Figure Out/Too Technical* was mentioned by 21 per cent (equal 4th).
  - *Insufficient Info. / Not Enough Info.* was listed by 18 per cent (5th).
  - *Couldn't Understand Info./Info. Vague/ Ambiguous/Poorly Written/Poorly Organised* was mentioned by 12 per cent (8th).
- 79 per cent of business respondents felt it was easy to switch supplier but 10 per cent felt it was difficult (similar to the results for households).



- In terms of the time it took to switch, 22 per cent felt it took more time than expected, 18 per cent felt it took less time and 58 per cent felt it took about what they expected (similar results to those for households).
  - However, it is difficult to tell from the survey what the expectations of the business respondents were from switching. For example, they could have had low expectations of the time it would take based on previous experience or knowledge gained from elsewhere.

## 5.7.2 Complaints About Switching

The AEMC has also analysed complaints about switching registered with jurisdictional energy Ombudsmen. Our consideration of this data leads us to highlight the following points:

- Transfer related complaints are less than 20 per cent of all complaints in all four jurisdictions covered.
- However, they are highest in NSW (19 per cent) and Victoria (14 per cent), the two states with the longest history and the highest rates of switching.
- The large increases in transfer related complaints – 85, 72 and 40 per cent increases in NSW, Vic and Qld respectively – is of concern.
- Although the AEMC notes that only a minority of these complaints related to delays in the transfer process and the remainder related to transfer issues which the AEMC has defined as outside the scope of its review, they nevertheless relate to a range of broader transfer issues.

## 5.7.3 Switching Times

Having examined the AEMC's analysis of MSATS data on switching times, we raise the following points for consideration:

- Although around half of switching outside Victoria is achieved in less than 30 days, which shows that many switches are achieved well within the maximum time allowed, it is a concern that over a quarter take between 30-60 days and over 20 per cent take more than 60 days. It would be useful to know the reasons for this.





- It is welcome that switching times have reduced since 2010 with increases for those achieved in less than 30 days and reductions for those taking more than 60 days.
- These trends are also evident (though less so) when special meter reads are excluded, perhaps suggestive of improvements in the efficiency of the switching.
- Although the Issues Paper says that nearly three-quarters of customer transfers in the NEM are completed in less than 20 calendar days (about 14 business days), this falls significantly for jurisdictions other than Victoria. It is of particular concern that this falls to only around one-third for NSW.
- Transfer completion times are markedly shorter in Victoria. Nearly two-thirds being completed within 30 days and only 15 per cent taking longer than 60 days. Moreover, over 70 per cent are completed in less than 10 calendar days and 86 per cent within 20 calendar days. ACCI attributes this to a combination of the 20 business day maximum time allowed and the extensive roll-out of smart meters in Victoria. These appear to be important indicators of what is possible in other parts of the NEM with a combination of the right policies and supporting regulations.
- It is a concern to ACCI that switching times in NSW are much longer than in the NEM overall (only 38 per cent completed in 30 days and 30 per cent taking longer than 60 days. Moreover, there appears to have been only limited improvement since 2010.
- Although lagging behind Victoria, it is pleasing that Queensland has achieved significantly better switching times than NSW (with 55 per cent completed in less than 30 days). Significant reductions in time taken since 2010 are also evident.
- In South Australia and the ACT around 45 per cent of transfers are completed in less than 30 days but South Australia has shown deterioration in time taken since 2010.
- Tasmania shows similar outcomes to South Australia and the ACT but, as full retail competition is not yet a reality in Tasmania, the results reflect switching times for small business only.



## 5.7.4 Impacts of Advanced Metering

ACCI supports a well-structured, cost effective and competitively based roll out of smart meters in the NEM where it can be demonstrated that their benefits clearly and unequivocally exceed the costs they impose of consumers. In terms of supporting more efficient and effective customer switching, we believe that the widespread use of smart meters can offer the following advantages:

- Lower overall switching times, as evident from Victoria (particularly when combined with lower allowed maximum switching times).
- Provide customers (and retailers) with more accurate and useful information about energy use and stimulate incentives to seek out (and offer) better electricity deals.
- Improve the accuracy of meter reads compared to manually read meters.
- Significantly speed up the reading of meters for customer transfers.
- Virtually eliminate the delays which difficulties with access to premises currently cause in switching, noting that this is the largest single cause of objections.
- Significantly reduce a number of sources of objection to customer transfers (e.g., no access to premises, wrong meter, and wrong date for read) which speeds up transfers.

Interval meters would offer some of these advantages but to a lesser extent.

We note that there have been significant numbers of interval meters installed in NSW, Qld, Vic and the ACT, but that smart meters are largely confined to Victoria at this stage. This suggests that the benefits listed above will not be immediately felt outside Victoria. Therefore, the adoption of rules and processes that facilitate customer switching is more important in the interim.

ACCI supports the contestable and open access approach to metering services adopted by the Standing Council on Energy and Resources (SCER). We believe that this is consistent with our desire to see a well-structured, cost effective and competitively based roll out of smart meters in the NEM where there is a clear cut case to do so on a cost-benefit basis. It should also support more efficient and timely switching.



Whilst we recognise that the Victorian approach to customer switching has some advantages and has delivered better results than elsewhere in the NEM, we are concerned that the AEMC has issued a draft rule determination proposing to extend the Victorian derogation on advanced metering by up to three years.

Our particular concern is that this supports the monopoly provision of smart meters by distribution businesses in Victoria and is inconsistent with the competitive framework supported by SCER and the AEMC in its Power of Choice review. We believe that the AEMC should examine what impact the Victorian approach has on switching in this review not just relative to other states but also relative to the competitive method favoured by SCER and the AEMC.

## 5.7.5 International Developments

In Appendix B, the Issues Paper discusses recent developments with switching in Sweden, New Zealand and Great Britain, where changes have recently been made, or are in prospect, mainly reflecting concerns about the time it takes to switch retailer and a desire to reduce this.

ACCI makes the following points about these international developments:

- The use of new rules for more frequent meter reading to drive a full roll out of remotely read interval meters in Sweden is worth the AEMC examining more closely.
- We note the 14 days maximum to completion transfer process in Sweden and the 10 days for New Zealand and believe these are relevant to considering where the NEM needs to be.
- Sweden and New Zealand mandate the display of a metering point identifier on the customer's bill in order to facilitate switching and, as mentioned earlier, we support this for the NEM.
- We also note the use of time limits and requirements on processes such as information provision between parties, meter reads, and final bill in Sweden and believe that the AEMC should consider the desirability of similar requirements in the NEM.
- Sweden and New Zealand do not allow losing retailers to stop transfers, with the exception of data errors in Sweden, and we would support similar



arrangements for the NEM. We note that Ofgem is also considering this for Great Britain.

- The greater use of estimated reads for accumulation meters in New Zealand appears to have arisen from a shortening of the maximum transfer time.

## 6. CONCLUSIONS AND RECOMMENDATIONS

We offer the following conclusions and recommendations for the AEMC's consideration:

1. ACCI believes that a more holistic assessment of the impediments to customer switching in the NEM was called for in this review than the AEMC propose.
2. The AEMC should add relevant comparisons of switching in other industries to its considerations in this review (e.g., gas, banking, insurance and telecommunications).
3. The AEMC should ensure that multiple regulatory instruments do not impede switching, especially for smaller consumers, by creating confusion and a lack of understanding.
4. The AEMC should ensure that jurisdictional differences in switching regimes do not impede switching or add to its costs. The AEMC should also ensure that any move to national arrangements is done on a best practice basis.
5. The AEMC should propose a significant reduction in the current permitted maximum switching time of 65 days. This should follow consideration of factors that impact on switching times, overseas experience and an opportunity to use the permissible maximum time as an incentive to shorten actual switching times.
6. Retailers should be required to place NMI information clearly on bills.
7. The review ought to consider the impact of mandated cooling off periods on switching times and possible reform options such as making these shorter or more flexible.



8. ACCI supports a range of options to reduce delays in switching caused by meter reading, such as separating meter reads from switching, and making greater use of retailer or customer self-read options and of estimated reads.
9. Regarding the raising of objections to customer switching, ACCI supports that objections that have no bearing on a customer transfer should not be allowed, that objections related to errors ought to include an obligation on the party who made the error to correct it expeditiously, that timeframes related to objections ought to be as short as possible, that the 20 day period to resolve objections be shortened, and that that customers must be expeditiously notified of any objections and of their nature.
10. ACCI supports a well-structured, cost effective and competitively based roll out of smart meters in the NEM where there is a clear cut case to do so on a cost-benefit basis as this will support more efficient and effective switching.
11. ACCI therefore supports the contestable and open access approach to metering services adopted by the Standing Council on Energy and Resources (SCER).
12. The limited introduction of smart meters outside Victoria means that the adoption of rules and processes that facilitate customer switching will be more important to improved switching in the interim than technology such as smart meters.
13. The AEMC should examine what impact the Victorian monopoly approach to smart metering has had on switching, not just relative to other states, but also relative to the competitive method favoured by SCER and the AEMC.
14. There are a range of developments in Sweden, New Zealand and Great Britain to facilitate switching that are relevant to consider for introduction into the NEM (e.g., more frequent meter reads, shorter maximum transfer times, need to display the NMI on all bills, shorter time limits on transfer processes, removal or limitations on the use of objections to stop transfers, greater use of estimated meter reads).



## 7. ACCI MEMBERS

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DEAKIN ACT 2600  
T: 02 6283 5200  
F: 02 6282 2436  
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[www.actchamber.com.au](http://www.actchamber.com.au)



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F: 07 3832 3195  
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[www.cciq.com.au](http://www.cciq.com.au)



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NORTH SYDNEY NSW 2060  
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[www.nswbc.com.au](http://www.nswbc.com.au)



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EAST PERTH WA 6004  
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F: 08 9365 7550  
E: [info@cciwa.com](mailto:info@cciwa.com)  
[www.cciwa.com](http://www.cciwa.com)



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F: 03 6231 1278  
E: [admin@tcci.com.au](mailto:admin@tcci.com.au)  
[www.tcci.com.au](http://www.tcci.com.au)



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136 GREENHILL ROAD  
UNLEY SA 5061  
T: 08 8300 0000  
F: 08 8300 0001  
E: [enquiries@business-sa.com](mailto:enquiries@business-sa.com)  
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F: 08 8981 1405  
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[www.chambernt.com.au](http://www.chambernt.com.au)



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[www.australianbeverages.org](http://www.australianbeverages.org)

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[www.afei.org.au](http://www.afei.org.au)

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[www.pacia.org.au](http://www.pacia.org.au)

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CHAMBER OF COMMERCE**

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E: vacc@vacc.asn.au  
[www.vacc.com.au](http://www.vacc.com.au)

