

30 May 2008

Mr Martin Johnson
Regulatory Analyst
Essential Services Commission
2nd Flor, 35 Spring Street
MELBOURNE VIC 3000

By email: CallCentrePerformance@esc.vic.gov.au

Dear Mr Johnson

Re: Electricity Distribution Call Centre Performance Indicators

Thank you for the opportunity to comment on the Essential Services Commission's (ESC's) *Draft Decision – Performance Indicators for Electricity Distribution call centres during wide-scale emergencies (May 2008)* ('the Draft Decision').

The Energy and Water Ombudsman (Victoria) (EWOV) appreciates the consideration that the ESC has given in its Draft Decision to EWOV's previous comments.¹

We wish to briefly comment on parts of the ESC's Draft Decision, as follows:

Definition of 'wide-scale emergency'

EWOV supports the ESC's proposal (at page 10) to require electricity distributors to:

- measure and report the performance indicators for the five days in which the call volumes are highest and the five days with the highest System Average Interruption Frequency Index (SAIFI) values across the distributor's network
- provide comments to explain why call volumes were highest on those five days.

Quality of information

In our previous comments, EWOV expressed support for the ESC including a qualitative measure in its performance indicators – relating to the quality and accuracy of information provided by call centres during wide-scale emergencies. Our support was based on our experience of customer complaints about inaccurate information.

¹ EWOV comments dated 17 January 2008 on the ESC's Consultation Paper *Electricity Distribution Call Centre performance Indicators (December 2007)* (on www.ewov.com.au)

EWOV notes that the ESC has (at page 12 of its Draft Decision) also identified the quality of information provided by distributors' call centres as an issue.

EWOV acknowledges the ESC's rationale (at page 12) for starting with monitoring quantitative measures only at this stage, and for reviewing the quality of information provided by call centres as part of its regulatory audits. EWOV confirms it is happy to provide any complaints data that may assist the ESC with such regulatory audits.

Measuring the extent of call centre overload

EWOV supports the ESC's proposals (at page 13) for distributors' reporting of the extent of call centre overload. In particular, we support reporting of the number of calls received and the number of calls affected by overload at each level, where this can be determined. It will be useful for this information to be published – to provide all stakeholders with a better understanding of the unfolding nature and impact of wide-scale emergencies.

Measuring caller waiting time

In our previous comments, EWOV suggested that requiring distributors to measure call waiting time for each 15-minute period of a wide-scale emergency was too granular. As such, we support the ESC's proposal (at page 15) for distributors to report for each 30-minute interval, rather than each 15-minute interval.

We also previously expressed concerns that reporting average call waiting times will not provide any information on the 'tail data'. We note the ESC has deferred this to the Australian Energy Regulator for its future consideration.

We trust that the above comments are helpful. EWOV looks forward to contributing to the reviews of the 2 April 2008 storm events being coordinated by the ESC and the Office of the Emergency Services Commissioner. If you have any questions, please contact Stephen Gatford, Manager Public Affairs and Policy, on (03) 9649 7599.

Yours sincerely



Fiona McLeod
Energy and Water Ombudsman (Victoria)