

13 June 2008



The Consumer Advocacy Panel
PO Box 43
Surry Hills VIC 3127

info@advocacypanel.com.au

Dear Sir/Madam,

The Energy Retailers Association of Australia (ERAA) welcomes the opportunity to make a submission to the Advocacy Panel's consultation on Grant Allocation and Application Guidelines.

The ERAA supports the overall objective of the Grant Allocation and Application Guidelines and believes it is important that such guidelines be established and adhered to. However the Association believes there are a small number of amendments which could be made to improve transparency and the overall financial accountability.

2.4 Applications

In keeping with making the process for applying for funding as transparent as possible the ERAA believes it is important that all applications, whether successful or unsuccessful, should be posted on the Advocacy Panel's website.

3.4 Other Matters

In order to maximise the diversity in projects funded by the Advocacy Panel the ERAA believes that small and medium sized consumer groups be limited to no more than 20 per cent of the Advocacy Panel's total funding and 10 per cent for any consumer group which represents large consumers.

The ERAA is of the view that the Advocacy Panel funding is used for bodies which are deserving of the funds. The Association therefore believes that applicants representing large customers must demonstrate that the project to which funding is being sought will benefit all consumers in the market.

4.2 Funding agreement and conditions

In order to minimise wasteful expenditure the ERAA believes that the continuation of any project must be predicated on the achievement of key milestones.

Moreover, in the event that a project is shown not to be meeting the milestones, the Advocacy Panel must have the ability to exercise its discretion to discontinue the project and require the reimbursement of part or all of the funding. Where it is shown that a milestone is not met due to circumstances outside the applicant's control then the Advocacy Panel should have the right to waive the reimbursement of funds by the recipient.

4.4 Records and Reporting

In order to prevent the misuse of funds the Association is of the view that an audit of recipients of the Advocacy Panel funding should be undertaken at least every two years.

Should you require any further information in relation to this submission please feel free to contact me on (02) 9437 6180.

Yours sincerely

A handwritten signature in black ink that reads "Cameron O'Reilly". The signature is written in a cursive style with a large, looped 'y' at the end.

Cameron O'Reilly
Executive Director
Energy Retailers Association of Australia