



PROJECTS ON THE GO

Activities of OTTER

prepared for the

OTTER Customer Consultative Committee

DECEMBER 2018

Printed December 2018

Office of the Tasmanian Economic Regulator

Level 3, 21 Murray Street, Hobart TAS 7000

GPO Box 770, Hobart TAS 7001

Phone: (03) 6166 4422

**OTTER CUSTOMER CONSULTATIVE COMMITTEE
MEETING 4/2018
THURSDAY 13 DECEMBER 2018**

PROJECTS ON THE GO

- 1. WATER AND SEWERAGE.....2**
- 2. COMPETITIVE NEUTRALITY - UPDATE ON CURRENT INVESTIGATIONS4**
- 3. ENERGY.....4**
- 4. ELECTRICITY - RETAIL AND DISTRIBUTION QUARTERLY PERFORMANCE
REPORTS (Q1, 2018-19).....9**
- 5. WATER AND SEWERAGE, ELECTRICITY AND GAS LICENSING (UPDATE)13**

1. WATER AND SEWERAGE

a. TasWater quarterly capital expenditure update (Q1 2018-19)

TasWater has provided its quarterly capital expenditure (capex) report for the first quarter of 2018-19, in accordance with the new requirement for capex reporting identified in the Regulator's 2018 Water and Sewerage Price Determination Final Report (Final Report). The purpose of the reporting is to provide greater transparency and reporting around TasWater's capital program.

TasWater's capital expenditure over the three year regulatory period (from 1 July 2018 to 30 June 2021) is expected to be around \$467 million, with budgeted capex of \$145 million for the 2018-19 financial year (against a budgeted \$143 million in TasWater's Price and Service Plan (PSP3)).

TasWater's report of current capex for PSP3 lists a total of 38 projects and 19 programs:

- 17 projects marked as 'included' (ie added since PSP3);
- 6 projects and 1 program marked as 'deferred' (ie will not commence in PSP3); and
- 1 project marked as 'completed'.

In total, TasWater has highlighted seven projects/programs that have been deferred, six of which relate to sewer networks and sewage treatment. Of these, the largest project deferred is the \$40 million Pardoe sewer improvement plan.

TasWater also notes that it has established a 'Capital Delivery Office' (CDO) to help resource the delivery of its capital works program. The CDO is expected to be operational by 1 July 2019.

After consulting with the other industry regulators, the Regulator provided feedback to TasWater with the objective of further improving the usefulness of the report to stakeholders.

b. Government reforms

On 1 May 2018 the Tasmanian Government, the Local Government Owners and TasWater entered into a Memorandum of Understanding (MoU).

Under the MoU, Local Government will retain majority ownership of TasWater while the State Government will become a shareholder by investing \$20 million per year for the next 10 years. Unlike the Local Government Owners, the State Government will not receive distributions from TasWater.

The State Government will have a greater role in TasWater's governance through:

- having input into TasWater's corporate plan and the process for appointing the Board and CEO;
- providing advice to the owners through the Department of Treasury and Finance; and
- instigating regular meetings between the relevant Ministers and TasWater's Chair and CEO.

In consultation with the relevant industry regulators, the MoU requires TasWater to develop an accelerated infrastructure investment program which will aim to deliver \$1.8 billion of infrastructure investment within the next 10 years.

At the Special General Meeting of council shareholders on 27 September 2018, 28 out of the 29 council owners voted in favour of the resolutions outlined in the MoU.

Amendments to the *Water and Sewerage Corporation Act 2012* were passed by Parliament on 30 August 2018 to reflect the changes in ownership and governance. Amendments to the *Water & Sewerage Industry Act 2008* (Industry Act) to reflect the pricing aspects of the reforms were passed by the House of Assembly on 18 October 2018 and by the Legislative Council on 1 November 2018.

Amongst other things, the amendments to the Industry Act ensure customers currently paying below the target tariffs will reach the target tariffs as soon as practicable without facing significant price shocks and clarify that TasWater is able to charge less than the maximum prices determined by the Regulator.

In terms of pricing:

- 2019-20 prices will be frozen at 2018-19 levels;
- price increases for 2020-21 will be capped at 3.5 per cent; and
- price increases for 2021-22 and later years will be capped at the lower of 3.5 per cent and the increases determined by the Regulator in future price determination investigations.

The Regulator will continue to regularly review TasWater's prices, operational efficiency, capex program and customer service delivery.

c. Tasmanian Water and Sewerage State of the Industry Report 2017-18

OTTER has commenced the preparation of the Tasmanian Water and Sewerage State of the Industry Report for 2017-18. OTTER and the other industry regulators are currently preparing their respective contributions. These are public health (Department of Health and Human Services - DHHS), environment (Environment Protection Authority Tasmania), water (Department of Primary Industries, Parks, Water and Environment - DPIPWE) and dam safety (DPIPWE).

The Report is being prepared using the same structure and format as the 2016-17 report. It will focus on key performance outcomes during the year and priorities for improving performance. Previous reports are available on OTTER's website. OTTER is also preparing a fact sheet to accompany the Report.

The Report is expected to be published in late March 2019, after the release of the Bureau of Meteorology's Urban National Performance Report for 2017-18 in March 2019.

2. COMPETITIVE NEUTRALITY - UPDATE ON CURRENT INVESTIGATIONS

The Economic Regulator's functions under the *Economic Regulator Act 2009* include conducting investigations, where appropriate, into complaints of breaches of the national competition policy competitive neutrality principles against State and local government bodies.

Since the last OCCC meeting held in September 2018, the Regulator has received one competitive neutrality complaint. This complaint has been from an owner of a private caravan and cabin park located in Southern Tasmania alleging that their local council has contravened the competitive neutrality principles by providing recreational vehicle overnight parking services without taking into account the full costs of providing such services. The Regulator has commenced the investigation of this complaint.

Notifications of the investigation have been sent to the council, the complainant and the Minister for Local Government.

3. ENERGY

a. Government electricity pricing reforms

Retail price regulation

The *Electricity Supply Industry Amendment (Price Cap) Bill 2018* was passed by the House of Assembly on 16 October 2018 and by the Legislative Council on 1 November 2018. The Bill:

- extends the expiry date of the current price determination by two years to 30 June 2021 (the requirement for the Regulator to conduct a standing offer pricing investigation prior to 30 June 2019 has therefore been removed);
- provides that the Regulator can only approve standing offer prices submitted to it that are no higher than the existing tariffs indexed by the percentage change in the Consumer Price Index for Hobart;
- extends the period for which a Wholesale Electricity Price (WEP) Order can be made by the Minister under the ESI Act by two years; and
- extends the requirement for the conduct of an independent review of the operation of the WEP Order provisions in the ESI Act by two years.

Now that the amendments have been passed, OTTER, in consultation with Aurora Energy, has commenced a review of the Standing Offer Price Approval Guideline. A revised version of the Guideline is expected to be finalised during December 2018/January 2019.

Feed-in Tariffs

Feed-in Tariff (FiT) customers currently receive either the transitional FiT rate of 28.283c/kWh¹ or the regulated FiT rate of 8.541c/kWh for excess energy exported to the grid.

On 1 January 2019, transitional FiT customers will revert to the regulated FiT rate.² However, the Tasmanian Government recently announced its decision to provide transitional FiT customers with a 5 cent/kWh bonus for a 12 month period, to 1 January 2020 to “help ease the adjustment from the premium Transitional FiT rate”.³

The Regulator is required to make a new determination in respect of the regulated FiT rate which is to commence on 1 July 2019. The regulatory period for the FiT rate determination will run for two financial years (2019-20 and 2020-21) ending on 30 June 2021, in alignment with the extended 2016 Standing Offer Price Determination.

The Regulator published its notice of intention to conduct a pricing investigation on 1 December 2018 and expects to release a Draft Report and determination in mid-February 2019. The submissions period closes mid-March 2019, with a Final Report and determination expected to be released at the end of April 2019.

The Regulator has included the possible introduction of a time-varying or time-of-use FiT as a matter to be considered as part of the investigation, as requested by the Tasmanian Government.

The FiT review Committee’s Final Report to the Government and associated documents and submissions are available on the Department of State Growth’s website:

https://www.stategrowth.tas.gov.au/energy_and_resources/energy/solar_feed-in_tariff_review.

Wholesale regulatory framework

The Government announced in the 2017-18 State Budget that it would review the Tasmanian wholesale electricity market regulatory pricing framework. In its subsequent *Tasmania-First* energy policy⁴, the Government made a commitment to remove the linkage to Victorian prices when setting the Tasmanian wholesale electricity price.

The Review commenced in November 2017 when the Department of Treasury and Finance invited written submissions. Consultation closed on 15 December 2017 with

¹ For small business customers the premium FiT Rate is 38.577c/kWh for the first 500kWh supplied during each billing period and 28.319c/kWh for each kWh supplied thereafter.

² According to TasNetworks’ *Annual Electricity Distribution Network Performance Report 2017-18*, as at 30 June 2018, there were 16 424 Transitional FiT customers and 12 849 Standard FiT customers.

³ Tasmanian Government Media Release, ‘*A fair and equitable solar tariff system*’, 21 November 2018.

⁴ Tasmanian Liberals, ‘*Tasmania-First energy policy*’, February 2018.

Aurora Energy, Australian Energy Council, Climate Capital and Hydro Tasmania making submissions.

The Terms of Reference for the Review and the submissions are available on Treasury's website: <https://www.treasury.tas.gov.au/government-businesses/strategic-reviews/review-of-the-tasmanian-wholesale-electricity-market-regulatory-pricing-framework>

Treasury has updated the Terms of Reference for the Review to align it with the Government's current policy position and to reflect the Government's implementation timeframes.

The Regulator understands that the next phase of the Review is currently underway.

b. Frequency Control Ancillary Services (FCAS)

The Regulator's monitoring of Tasmanian FCAS costs identified FCAS costs trending down during autumn and winter of 2018, but increasing back to previous levels during spring.

AEMO's published FCAS cost recovery rates show that almost all of the FCAS cost increase in Tasmania over the spring of 2018 was due to increased generator recovery rates, particularly in late September/early October during a planned outage of TasNetworks' 220kV Palmerston-Sheffield transmission line. This outage placed contingency generation limits on multiple hydro generators in North West Tasmania, significantly reducing Tasmania's potential FCAS sources.

Over the last twelve weeks, FCAS cost recovery rates for generators in Tasmania have averaged around \$2.50/MWh, while recovery rates for customers have largely remained steady below \$0.50/MWh. Tasmania's contribution to total NEM FCAS costs has mostly stayed between 10 per cent and 20 per cent during this time.

c. Energy in Tasmania 2017-18

OTTER published the Regulator's Energy in Tasmania (EiT) Report for 2017-18 on 30 November 2018.

The Report noted that all major Tasmanian generation sources showed increased output in 2017-18, with total generation nearly ten per cent higher than in the previous two years. Solar generation also increased, with more than 2 000 customers connecting solar PV systems to the network bringing the total number of solar PV customers to over 29 000, though solar PV systems provided less than one per cent of Tasmania's total electricity generation.

Electricity demand increased by almost four per cent during 2017-18. However, Tasmania was able to meet the increased demand while still being a net exporter of electricity via Basslink for the first time since 2013-14. In addition, Hydro Tasmania's water storages remained at around 40 per cent capacity for much of the year.

During 2017-18, the energy supply industry experienced relatively few disruptions with the duration and frequency of outages similar to previous years, although the number of communities performing poorly against particular reliability measures increased due to the number and extent of weather related outages.

OTTER will provide OCCC members with a summary of the Report at the 13 December 2018 meeting.

d. Energy Security Monitor and Assessor status update and overview of current energy security position

The *Energy Co-ordination and Planning Amendment Bill 2018* was passed by the House of Assembly on 27 November 2018. The Bill was unable to be passed by the Legislative Council before Parliament rose for the year and will be considered when Parliament next sits in March 2019.

Among other things, the Bill provides for the appointment of the Regulator as Monitor & Assessor and gives the Regulator the necessary powers to carry out that role.

Currently, Section 9 of the *Electricity Supply Industry Act 1995* (Special reports to the Minister) is being used to implement the Government's Energy Security Risk Response Framework.

The detailed roles and responsibilities of Hydro Tasmania, the Energy Security Coordinator and the Monitor and Assessor under the framework are being set out in memoranda of understanding.

The MoU with Hydro Tasmania has been signed. OTTER is currently liaising with the Department of State Growth with a view to finalising that memorandum of understanding as soon as possible.

Annual Energy Security Review 2017-18

The second Annual Energy Security Review was published on 3 December 2018. The report contains a review of the most recent water year (2017-18) and an assessment of the forthcoming water year (2018-19).

The analysis in the report indicates that Tasmania's available energy supply will be sufficient to meet demand over the coming 12 months. Based on current inflow assumptions for Tasmanian hydro storages, on-island hydro and wind generation will be able to meet Tasmanian demand in the event of the temporary loss of the Tamar Valley Power Station (TVPS) generation or a Basslink outage.

Energy in storage remained above the Prudent Storage Level (PSL) throughout the 2017-18 water year with 6 623 GWh in storage at the end of the water year (representing 46 per cent of total usable energy in storage and six per cent above the PSL).

Large-scale wind projects in Tasmania that have met AEMO's commitment criteria are expected to deliver an additional 256MW of on-island generation and to have a positive impact on Tasmania's energy security during the 2019-20 water year.

During the 2017-18 water year, Hydro Tasmania was unable to export or import for around two and a half months due to a Basslink outage. Given energy in storage was above the PSL at the start of the outage, and the above average inflows that occurred during the outage, Tasmania's energy supply remained secure. The water storage position during the water year also meant that Hydro Tasmania only operated the TVPS generation units for commercial reasons and testing following scheduled maintenance of the Combined Cycle Gas Turbine in August 2018.

Gas transportation arrangements between Hydro Tasmania and Tasmanian Gas Pipeline Pty Ltd (TGP) were finalised through arbitration in May 2018. The outcome

secures ongoing access to the pipeline for the TVPS and Hydro Tasmania's wholesale gas customers for the next four years. The Australian Energy Market Operator and the Australian Competition and Consumer Commission have also concluded that there would be sufficient supply in the east coast gas market for 2019.

The Monitor and Assessor did not propose any changes to the PSL and High Reliability Level in the Report as there have been no material changes in supply or demand.

Current energy security position

Energy in storage as at the beginning of December 2018 was 43.5 per cent.

Based on information provided by Hydro Tasmania, the Monitor and Assessor estimates that it is highly probable Tasmanian hydro storages will remain above the High Reliability Level over the next 90 days, assuming average conditions.

Hydro Tasmania reports that storages remain above the High Reliability Level over the next 90 days in all of its simulated inflow sequences.

e. Review of Aurora Pay As You Go product

Aurora has been undertaking a review to develop a replacement for its Pay As You Go product (APAYG). The APAYG product has around 22 000 customers and Aurora Energy aims to fully decommission the product by December 2019.

Aurora Energy has designed a new product to replace APAYG called Aurora Pay As You Go plus (APAYG+) which is enabled by Advanced Meters (communications enabled interval meters or Type 4) and will be offered with a standard retail contract Residential Time-of-Use tariff (Tariff 93).

Existing APAYG customers will be required to choose between standing offer tariffs T31/41, T93, or T93 with the APAYG+ app. The app costs \$40 per year and is offered on an opt-in basis under a separate unregulated contract.

APAYG+ was launched in October 2018 via a trial with a targeted meter replacement program scheduled to start in January 2019.

OTTER understands that Aurora Energy has engaged with Anglicare, the Migrant Resources Centre and the Council of the Aged (COTA) during the development of the product.

The additional features of APAYG+ include:

- digital functionality via mobile app, tablet or desk top computer;
- account balance and estimated days in credit remaining provided daily;
- usage information daily, weekly, monthly, quarterly and annually;
- monthly bills delivered electronically; and
- “push” notifications to facilitate customers remaining in credit.

Aurora will give a presentation on its PAYG+ product at the December 2018 meeting.

4. ELECTRICITY - RETAIL AND DISTRIBUTION QUARTERLY PERFORMANCE REPORTS (Q1, 2018-19)

Aurora Retail

Aurora Energy (Retail) has provided its performance report for Q1, 2018-19 as required by Regulation 13 of the *Electricity Supply Industry Regulations 2008*. Performance measures are reported in accordance with the AER's performance reporting procedures and guideline and are provided in Appendices 1 and 2.

TasNetworks

TasNetworks has provided its performance report for Q1, 2018-19.

Network performance is measured by:

- System Average Interruption Duration Index (SAIDI) - the total duration of all outages divided by the number of customers served (this provides a measure of the average outage duration experienced by each customer).
- System Average Interruption Frequency Index (SAIFI) - the total number of interruptions divided by the number of customers served (this provides a measure of the average number of interruptions experienced by each customer).
- Customer Average Interruption Duration Index (CAIDI) - the total duration of all outages divided by the total number of interruptions (this provides a measure of the average time taken to repair an interruption to supply).
- Momentary Average Interruption Frequency Index (MAIFI) - the total number of momentary interruptions divided by the number of customers served (this provides a measure of the average number of momentary interruptions experienced by each customer).

Table 1 shows TasNetworks' recent performance on a per customer basis.

Table 1 Overall system performance

	2017/2018 Q1	2017/2018 Q2	2017/2018 Q3	2017/2018 Q4	2018/2019 Q1
SAIFI	0.46	0.38	0.60	0.61	0.58
SAIDI	57.01	50.87	94.83	142.75	77.81
CAIDI	124.20	132.28	157.02	232.34	133.91
MAIFI	1.33	1.55	1.24	1.11	1.42

Figure 1 and Figure 2 show the outage causes and the contribution those outages made to SAIFI and SAIDI performance respectively.

There were two Major Event Days (MEDs) during Q1, 2018-19. These MEDs occurred on 8 July 2018 and 15 August 2018, and contributed 13.42 minutes and 10.07 minutes respectively to the total 77.81 minutes of SAIDI for the quarter.

Figure 1 Contributions to SAIFI

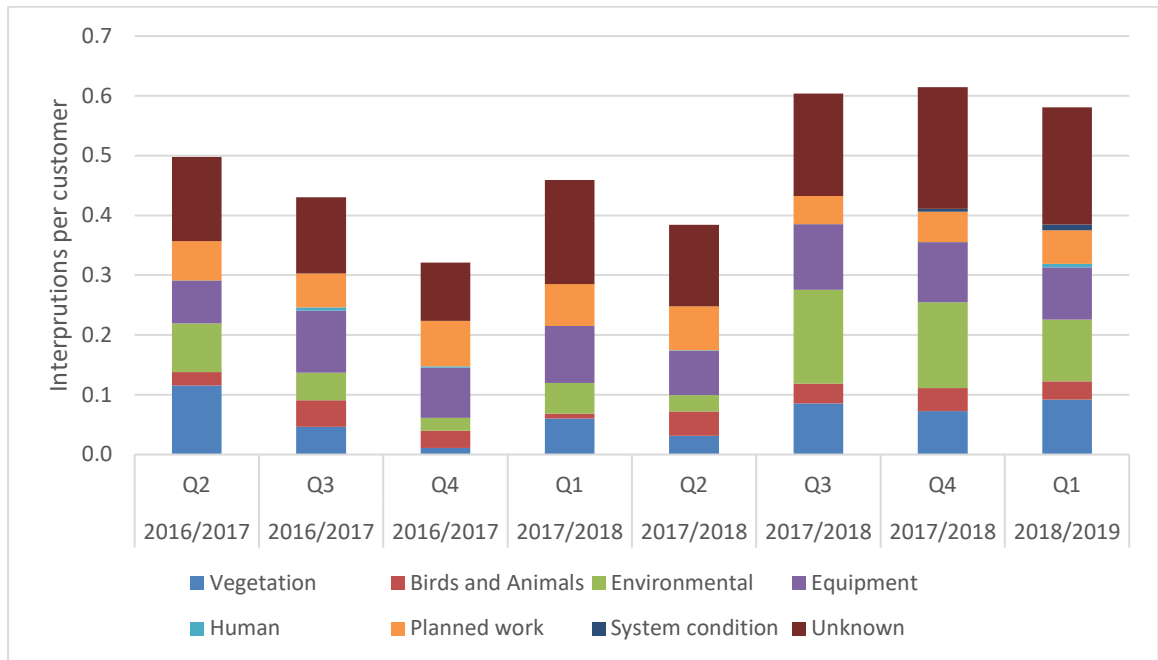
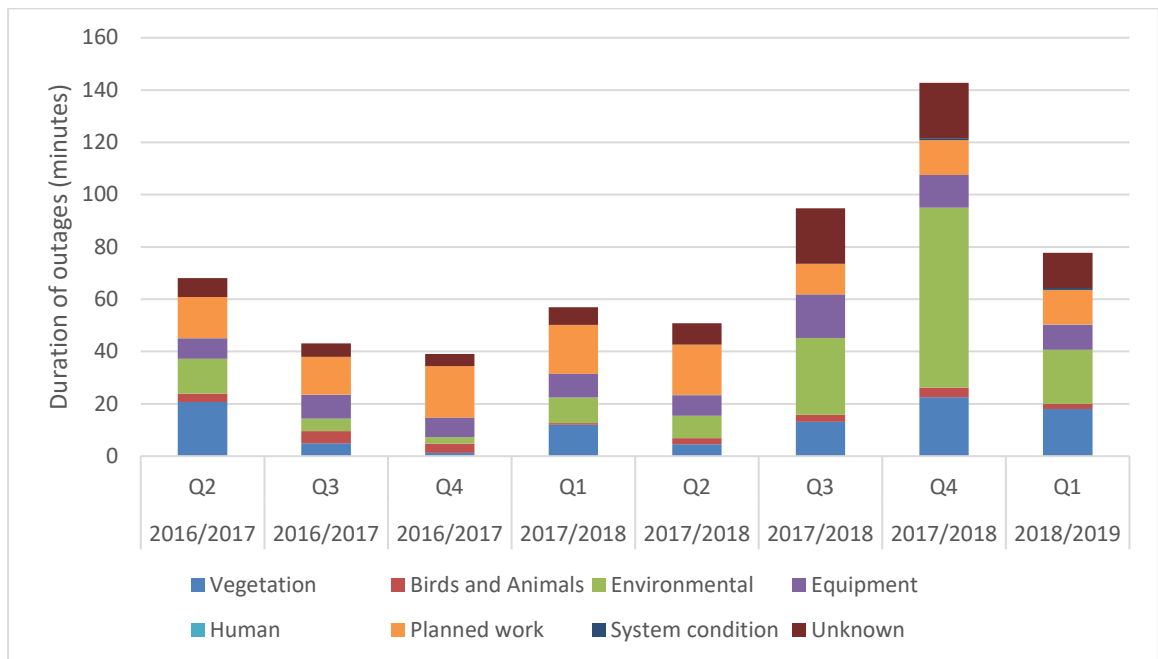


Figure 2 Contributions to SAIDI



Community and category performance

A summary of quarterly performance for the 101 Communities is provided in Tables 3, 4 and 5.

Table 3 Communities Exceeding Duration and Frequency Standards

	2017/2018				2018/2019
	Q1	Q2	Q3	Q4	Q1
Number of communities exceeding SAIFI standard	7	7	16	11	17
Number of communities exceeding SAIDI standard	21	14	38	38	26
Number of communities exceeding either SAIDI or SAIFI standard	25	17	39	39	29
Number of communities exceeding both SAIDI and SAIFI standards	7	7	13	11	14

Table 4 Community Category Performance - SAIFI

	2017/2018				2018/2019	Annual Target
	Q1	Q2	Q3	Q4	Q1	
Critical Infrastructure	0.05	0.05	0.00	0.05	0.12	0.20
High Density Commercial	0.07	0.02	0.09	0.19	0.27	1.00
Urban and Regional Centres	0.29	0.28	0.44	0.47	0.37	2.00
Higher Density Rural	0.66	0.58	0.93	1.02	0.95	4.00
Lower Density Rural	1.03	0.70	1.06	0.93	1.16	6.00

Table 5 Community Category Performance - SAIDI

	2017/2018				2018/2019	Annual Target
	Q1	Q2	Q3	Q4	Q1	
Critical Infrastructure	13.40	11.55	0.09	4.57	32.25	30
High Density Commercial	10.43	1.58	14.06	44.09	29.59	60
Urban and Regional Centres	30.30	27.07	58.34	111.62	40.11	120
Higher Density Rural	100.87	74.83	151.85	216.08	110.03	480
Lower Density Rural	135.55	136.59	208.14	220.31	215.51	600

Customer Service

Table 6 Customer service performance indicators

	2017/2018				2018/2019
	Q1	Q2	Q3	Q4	Q1
<i>Call Centre performance</i>					
Calls received	10 000	9 101	15 733	15 369	12 194
Calls answered within 30 seconds	80.72%	83.78%	63.11%	65.03%	79.47%
<i>Supply Reliability</i>					
New Connections	714	653	569	843	857
Customer charter payments/value	48/\$5 040	37/\$3 570	14/\$1 320	56/\$6 480	131/\$16 410
Complaints - reliability/quality of supply/complaints as a percentage of installations	177 (0.06%)	138 (0.05%)	127 (0.04%)	138 (0.05%)	113 (0.04%)
Reconnections	6 467	6 086	6 597	6 012	6 059
Total Customer Charter payments for reconnections (number / \$)	0/\$0	0/\$0	0/\$0	0/\$0	0/\$0
Street Lighting reported faults	628	306	296	915	766
Street lighting customer charter payments (number / \$)	9/\$270	2/\$60	0/\$0	0/\$0	0/\$0
GSL - Number of payments	2 327	2 315	6 056	20 644	5 612
Amount	\$ 203 840	\$ 230 400	\$ 555 200	\$ 2 279 360	\$ 589 120

5. WATER AND SEWERAGE, ELECTRICITY AND GAS LICENSING (UPDATE)

Tasmanian Networks Pty Ltd electricity transmission and distribution licences - renewal

On 9 November 2018, the Regulator renewed the electricity transmission and distribution licences held by Tasmanian Networks Pty Ltd for a further period of 10 years, effective 21 December 2018.

UPC Robbins Island Pty Ltd - issue of a new electricity generation licence

On 19 September 2018, the Regulator received an application from UPC Robbins Island Pty Ltd for an electricity generation licence to operate a number of wind turbines at two proposed locations. The initial combined installed generation capacity will be approximately 660 MW.

On 1 October 2018, the Regulator issued a generation licence to UPC Robbins Island Pty Ltd for a period of 10 years, effective from 5 October 2018.

Weston Energy Pty Ltd - issue of a new gas retail licence

On 4 October 2018, the Regulator received an application from Weston Energy Pty Ltd for a gas retail licence.













On 10 October 2018, the Regulator issued Weston Energy Pty Ltd a gas retail licence for a period of 10 years, effective from 10 October 2018.

Appendix 1 – Aurora Energy quarterly performance – residential

Retail - Residential	Trend - 5 qtrs	2017-18 Q1	2017-18 Q2	2017-18 Q3	2017-18 Q4	2018-19 Q1
Customer numbers						
standing offer		217 487	218 405	218 585	220 049	221 719
APAYG customers		22 013	21 597	21 496	21 076	20 479
Payment difficulties						
debt repayment		2 848	4 340	4 914	3 710	3 147
average amount		\$784	\$728	\$738	\$776	\$806
debt \$500 - \$1 500		700	1 146	1 358	965	835
debt \$1 500 - \$2 500		208	302	345	263	246
debt over \$2 500		197	246	275	240	216
Payment plans						
customers on payment plan		2 661	3 027	2 906	2 797	3 155
customers who had their plan cancelled for non-payment		556	750	1 007	847	810
customers with 2 or more plans cancelled in the last 12 months		162	232	244	249	248
Disconnections						
residential disconnections		223	136	264	195	177
concession customers disconnected		107	70	113	71	64
payment plan customers disconnected		67	28	61	51	46
customers disconnected more than once in 24 months		27	13	9	4	11
Reconnections						
reconnections (within 7 days)		117	81	124	88	89
payment plan customers		31	19	31	19	21
concession customers		53	46	61	32	31
APAYG - Prepayment meter (PPM) customers						
PPM customers with a concession		11 759	11 503	11 505	11 304	11 017
PPMs able to report self-disconnections		10 307	10 417	10 404	10 841	9 955
PPM self-disconnection events		885	666	512	852	816
customers self-disconnected		699	540	433	680	672
average duration of disconnection events (minutes)		257	223	282	247	280

Retail - Residential	Trend - 5 qtrs	2017-18 Q1	2017-18 Q2	2017-18 Q3	2017-18 Q4	2018-19 Q1
Hardship program						
customers on the hardship program		2 568	2 970	3 156	3 251	3 490
hardship customers with a concession		2 014		2 461	2 492	2 667
customers denied access		0	0	0	0	0
customers exiting the program		323	385	523	517	440
average debt upon entry to program		\$1 458	\$1 599	\$1 705	\$1 304	\$1 510
debt \$0 - \$500		103	95	76	93	90
debt \$500 - \$1 500		319	387	336	283	345
debt \$1 500 - \$2 500		141	163	172	137	146
debt over \$2 500		120	142	125	101	98
average debt		\$1 518	\$1 578	\$1 353	\$1 304	\$1 497
customers who successfully completed program		68	61	123	200	144
customers excluded from program		163	222	270	174	170
customers who transferred		92	102	130	143	126
Complaints (residential)						
billing		2 557	2 658	2 378	2 655	3 332
marketing		0	0	0	0	0
customer transfer		0	0	0	0	0
other		1 274	1 355	1 339	1 576	1 496
TOTAL		3 831	4 013	3 717	4 231	4 828

Appendix 2 – Aurora Energy quarterly performance – small business

Retail - Small Business	Trend - 5 qtrs	2017-18 Q1	2017-18 Q2	2017-18 Q3	2017-18 Q4	2018-19 Q1
Customer numbers						
standing offer		30 285	31 252	31 182	31 276	31 542
market contracts		4 577	4 312	4 355	4 192	3 899
Total small business		34 862	35 564	35 537	35 468	35 441
Payment difficulties						
customers repaying a debt		127	153	179	162	129
average customer debt		\$ 414	\$1 010	\$ 449	\$ 386	\$ 453
Disconnections		4	12	7	19	15
Reconnections		1	3	0	2	6
Complaints						
billing		279	377	382	401	422
marketing		0	0	0	0	0
customer transfer		0	0	0	0	0
other		54	102	105	91	109
TOTAL		333	479	487	492	531