



ENERGY & WATER  
OMBUDSMAN SA

GPO Box 2947  
Adelaide SA 5001

T 1800 665 565  
F 1800 665 165

ABN 11 089 791 604

[ewosa.com.au](http://ewosa.com.au)

Mr Sebastian Roberts  
General Manager  
Australian Energy Regulator  
GPO Box 520  
Melbourne, Victoria, 3001

Submitted electronically [AGNSA2021@aer.gov.au](mailto:AGNSA2021@aer.gov.au)

6 August 2020

Dear Mr Roberts,

**Submission to the Australian Energy Regulator's ("the AER") Consultation on the Australian Gas Network ("AGN") SA Access Arrangement 2021-26 ("Access Arrangement")**

The Energy and Water Ombudsman (SA) Limited ("EWOSA") welcomes the opportunity to comment on the AGN SA Access Arrangement.

EWOSA is an independent Energy and Water Ombudsman Scheme in South Australia. It receives, investigates and facilitates the resolution of complaints by customers with regard to (*inter alia*) the connection, supply or sale of electricity, gas or water.

## **Background**

EWOSA has welcomed involvement in the co-design workshops focussed on vulnerability as part of AGN's development of its Draft Plan. EWOSA submitted in support of the AGN proposal to develop a vulnerable customer assistance program.

In its Draft Plan, AGN noted that opportunities to support vulnerable customers which AGN were considering include:

- A priority services register that allows AGN to proactively contact customers in circumstances such as outages
- Rebates or discounts for connection fees or plumbing assistance
- Policy advocacy for vulnerable customers
- Specialised training programs for customer facing service roles.

EWOSA submitted to AGN that all of these initiatives would be valuable in supporting those most vulnerable in our community. We see much evidence of the challenges some customers are facing in South Australia and believe that supporting vulnerable customers is a high priority for the energy and water sector.

## Submissions

EWOSA receives complaints and disputes between consumers of electricity, gas and water services and members of the Scheme. AGN is a member of EWOSA.

Over the 2019 - 20 financial year, EWOSA received cases relating to AGN in the following broad categories:

Category of case
Billing
Credit Management
Customer Service
General Enquiry
Land
Provision
Sales & Marketing
Supply Quality

**Table 1: Cases received by EWOSA related to AGN for 2019-20 financial year**

A breakdown of the categories is provided in Appendix A.

## Community Engagement

AGN has undertaken a very extensive engagement program and is to be commended for its efforts in this regard. EWOSA understands that AGN is keen to continue high level community engagement beyond the access arrangement process and we support this direction.

## Operating expenditure

EWOSA is highly supportive of AGN's proposed Vulnerable Customer Assistance Program (VCAP). We believe that having a dedicated vulnerable customer service role within AGN will ensure the necessary priority is given to vulnerable customers. We support the proposal to include policy development as part of this service role, given the interplay between customer experience and the development of leading practice policy. We support the development of a priority services register as a means of targeting support.

Thank you for consideration of this submission. Should you require further information or have any enquiries in relation to this submission, please contact Jo De Silva via [jo.desilva@ewosa.com.au](mailto:jo.desilva@ewosa.com.au) or phone (08) 8216 1851.

Yours sincerely,



Jo De Silva  
Policy and Communications Lead  
Energy and Water Ombudsman SA

## Appendix A – Australian Gas Networks Cases Received by EWOSA 2019 - 20

			FY 2020 Q1	FY 2020 Q2	FY 2020 Q3	FY 2020 Q4
Billing	Billing Process	Inaccurate Estimate	1	1		
Billing	Fees and Charges	Other Fees	1			1
Billing	High	Unexplained Usage				1
Billing	Total	Total	2	1		2
Credit Management	Disconnection (incl imminent)	Actual Disconnection	1			
Credit Management	Total	Total	1			
Customer Service	Staff Behaviour	Information Incorrect Not Provided		1	1	
Customer Service	Total	Total		1	1	
General Enquiry	Information general	Contacted EWOSA In Error	12	9	17	4
General Enquiry	Information general	Information Provided	3	1	2	1
General Enquiry	Information general	Insufficient Information to Progress Case	1			2
General Enquiry	Information general	Regulatory or Industry Info	1			1
General Enquiry	Out of Jurisdiction	Capital Contribution Enquiry	1			
General Enquiry	Out of Jurisdiction	Legal Advice or Civil Dispute	1			
General Enquiry	Out of Jurisdiction	Non Energy or Water	1		1	
General Enquiry	Out of Jurisdiction	Other OOJ		1		
General Enquiry	Total	Total	20	11	20	8
Land	Damage Land	Delay in Repair	3	4	2	
Land	Damage Land	Property	3	6	1	1
Land	Damage Land	Reimbursement Claim	1		1	1
Land	Land Other	Meter Placement Access		1	4	
Land	Network Infrastructure	Cost of Infrastructure	1		1	
Land	Network Infrastructure	Maintenance	7	2	1	6
Land	Network Infrastructure	Placement of Infrastructure		3	2	
Land	Network Infrastructure	Safety of Infrastructure	1			1
Land	Network Infrastructure	Visual Noise Pollution				1
Land	Total	Total	16	16	12	10
Provision	Connection	Delay in Connection	6	5	4	2
Provision	Connection	Other Connection Issue	4	2	2	
Provision	Disconnection	Disconnection Error	4	2	1	
Provision	Disconnection	Supply / defect	5	7	2	2
Provision	Meter Installation or Abolishment	Delay In Abolishment		1		
Provision	Meter Installation or Abolishment	New Connection Delay	2	2	1	
Provision	Meter Installation or Abolishment	Other Meter Upgrade Delay		2	1	

Provision	Meter Installation or Abolishment	Other Metering Installation Complaints	3	2	3	3
Provision	Meter Tests and Reads	Inaccurate Read				1
Provision	Total	Total	24	23	14	8
Sales Marketing	Contract	Access to a Contract				1
Sales Marketing	Total	Total				1
Supply Quality	Outages	Duration of Unplanned Outage	2		1	1
Supply Quality	Outages	Duration Frequency of Planned Outage	2	1	1	2
Supply Quality	Outages	Frequency of Unplanned Outage	1	1		
Supply Quality	Outages	Notice Of Planned Outage	1			2
Supply Quality	Variation in Supply Leakages	Gas Leak concerns	2	2	2	2
Supply Quality	Variation in Supply Leakages	Variation in Gas Supply	1		1	1
Supply Quality	Total	Total	9	4	5	8
Grand Total	Total	Total	72	56	52	37