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Acting General Manager, Compliance and Enforcement  
Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3001

Submitted by email: [AERexemptions@aer.gov.au](mailto:AERexemptions@aer.gov.au)

30 June 2021

Dear Ms Darwin,

**Submission to the AER Updating the Network and Retail Exemption Guidelines Consultation Paper (“AER Exemption Guidelines Consultation”)**

The Energy and Water Ombudsman (SA) Limited (“the Scheme” or “Energy & Water Ombudsman SA”) welcomes the opportunity to comment on the AER Exemption Guidelines Consultation.

Energy & Water Ombudsman SA is the independent energy and water ombudsman scheme in South Australia. It receives, investigates and facilitates the resolution of complaints from customers of energy and water providers about (*inter alia*) the connection, supply or sale of electricity, gas or water.

**Background**

The Scheme has prepared a submission on embedded networks for the South Australian Parliamentary Inquiry into Embedded Networks. That submission includes information about our Embedded Networks Members, cases received and case studies. It is attached as an Appendix to this submission.

**Consultation Questions**

The Consultation questions to which the Scheme will respond are considered below:

*Question 10 Should the information embedded network owners/operators provide prospective customers be standardised?*

We support standardising the information embedded network owners or operators must provide prospective customers. We agree with the AER that standardised statements will provide essential information to customers about proposed changes to their supply arrangements and how this will affect them, including advantages and disadvantages.

*Question 16 Do stakeholders have a preference – for a broader set of hardship assistance conditions or an exempt seller hardship plan?*

We believe an exempt seller hardship plan is appropriate and that this should offer the same level of protections as provided for customers of authorised retailers.

*Question 17 What key protections should be included in a hardship policy template for exempt sellers?*

See response to question 16.

*Question 18 What additional obligations should the core exemption conditions include?*

We support customers in embedded networks having equivalent protections to those of customers of authorised retailers in relation to payment difficulties in general, not just hardship provisions.

*Question 19 Are there other measures that would facilitate exemption holders' taking up membership of ombudsman schemes?*

We believe the AER is best placed to ensure exemption holders take up membership of ombudsman schemes through its compliance and enforcement powers.

Thank you for consideration of this submission. Should you require further information or have any enquiries in relation to this submission, please contact me on 08 8216 1851.

Yours sincerely



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

**Appendix A: Energy & Water Ombudsman SA Submission to SA Parliamentary Inquiry on Embedded Networks**