



ENERGY & WATER
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Retailer Energy Productivity Scheme (REPS) Code Review – Draft Decision
Essential Services Commission of South Australia
GPO Box 2605
Adelaide SA 5001

29 November 2021

Dear REPS Review Team,

Submission to the Essential Services Commission of South Australia (the Commission): Retailer Energy Productivity Scheme (REPS) Code Review – Draft Decision

The Energy and Water Ombudsman (SA) Limited (the Scheme or Energy & Water Ombudsman SA) welcomes the opportunity to submit on the Essential Services Commission of South Australia's Retailer Energy Productivity Scheme (REPS) Code Review – Draft Decision.

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.

The Scheme will comment on the following proposals from the Draft Decision:

- record keeping obligations
- provision of information to customers
- clarifying fit and proper person obligations
- line of sight between obliged retailers and customers
- REPS customer co-payments.

Record keeping obligations

The Scheme considers that the proposal to clarify record keeping requirements, such that obliged retailers must retain actual possession of all activity records for a period of five years following the completion of the activity, strikes an appropriate balance between securing activity records and keeping costs at a reasonable level.

Provision of information to customers

The Scheme supports the provision of information to customers at the time of commencement of the activity as a means of ensuring consumer protections and removing the current ambiguity associated with "*the time the activity is performed*" (clause 6.1).

Clarifying fit and proper person obligations

The Scheme supports the introduction of minimum standards which must be applied by obliged retailers when conducting fit and proper person assessments as a means of further reducing the risk of harm to customers.

Line of sight between obliged retailers and customers

The Scheme supports provision to the consumer of the name of the obliged retailer on whose behalf the activity is undertaken prior to commencement of the REPS activity as a means of ensuring effective complaints and dispute resolution.

REPS customer co-payments

The Scheme supports the proposal that the existence and amount of any co-payment must be clearly communicated to the customer at the time of booking and in the information statement, so that customers can make informed decisions about whether or not to proceed with a REPS activity.

Thank you for consideration of this submission. Should you require further information or have any enquiries in relation to this submission, please contact me at jo.desilva@ewosa.com.au or on (08) 8216 1851.

Yours sincerely



Jo De Silva
Policy and Communications Lead