



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

Ms Tamsyn Hinksman
Senior Policy Officer
Essential Services Commission of South Australia
GPO Box 2605
Adelaide SA 5001

By email reviews@escosa.sa.gov.au

30 January 2024

Dear Ms Hinksman,

**Submission to the Essential Services Commission of South Australia (Commission):
Review of Small-Scale Network Reporting Requirements
and Prescribed Customer Consumer Protections**

The Energy and Water Ombudsman (SA) Limited (EWOSA) welcomes the opportunity to submit to the Commission on the Review.

EWOSA is the 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.

EWOSA supports clear reporting obligations being placed on small-scale electricity, gas, water and sewerage networks in the Regulatory Reporting Requirements for Small-Scale Networks – Guideline No 5 (Guideline 5) – and the inclusion of the requirements on Cowell Electric Supply Pty Ltd. in that guideline.

We support the potential amendments to Guideline 5 proposed in the factsheet released by the Commission, particularly:

- the additional reporting requirements relating to hardship
- the removal of the reporting metric on the number of customers receiving a concession, considering the point that small-scale networks don't have access to the data
- the specific three business days timeframe for retailers to provide information on material service issues
- the inclusion of the prepayment metering public reporting requirements.

We question whether the potential amendment of an additional reporting requirement for all retailers to report on the 'number and average duration of supply interruptions' should be required of networks instead, even though in most cases the small-scale network and the small-scale retailer servicing the same customers will be the same organisation.

EWOSA recommends that a requirement on small-scale networks and Cowell Electric Supply Pty Ltd. to report on complaints they receive from customers be included in Guideline 5. This would provide visibility on the number of complaints small-scale networks receive and enable comparison with EWOSA's own complaints data. While EWOSA receives very few complaints from small-scale networks, this comparison would be useful in providing insights on how well providers handle customer complaints and what proportion of complaints require referral to EWOSA for them to be resolved.

Thank you for consideration of this submission. Should you require further information or have any enquiries regarding this submission, please contact me at antony.clarke@ewosa.com.au or on (08) 8216 1861.

Yours sincerely



Antony Clarke
Policy and Governance Lead