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5 March 2025

Dear Lissa,

**Submission to the Essential Services Commission of South Australia (Commission):  
Support for Customers Affected by Family Violence – Reporting Metrics**

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

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 strongly supports applying reporting metrics associated with customers affected by family violence to energy and water entities.

We support the reporting metrics proposed in the Consultation Paper. We note that these largely align with the reporting requirements from the Australian Energy Regulator (AER) on energy retailers regarding customers affected by family violence – Indicators S6.12 to S6.15 on page 62 of the “AER (Retail Law) Performance Reporting Procedures and Guidelines (Version 4)”.

However, the main difference is that the AER’s metrics for the number of customers affected by family violence on payment plans and hardship programs are for total numbers and not for those that entered payment plans and hardship programs during the reporting period.

We suggest that the Commission include reporting metrics for both the total number of customers affected by family violence on, as well as those that entered, payment plans and hardship programs for the reporting period.

We also suggest the addition of the following reporting metrics for SA Water:

- the number of customers affected by family violence that had their water restricted during the reporting period
- the average level of debt of customers affected by family violence participating in SA Water’s Payment Assistance Program (PAP) during the reporting period

- the level of debt of customers affected by family violence had upon entering the PAP during the reporting period.

SA Water provides information on both the number of customers who have had their water supply restricted for non-payment of a bill and on the average bill debt for residential customers participating in the PAP in their “Quarterly Performance Measures” reports that are available on their website. Given the collection of this data, we hope it would not be an onerous and costly step for SA Water to provide the reporting metrics suggested above for customers affected by family violence.

EWOSA is aware that some customers affected by family violence may not be participating in SA Water’s PAP and would therefore not be captured by the above suggested reporting metrics. Collecting the data for these customers may be difficult. We suggest that the Commission ask SA Water to consider what can be done to facilitate the collection of such data for possibly including in reporting metrics for customers affected by family violence in the future.

We believe small-scale energy and water entities should not be required to provide this extra level of data. This reflects:

- potential confidentiality and privacy concerns, such as if it is possible for a perpetrator to identify a victim-survivor from any data that is publicly reported about a small-scale entity with only a small number of customers
- the administrative burden and associated costs
- the fact that there isn’t currently a similar requirement for traditional or authorised energy retailers and to impose additional reporting requirements on small-scale entities would be unreasonable.

An important consideration regarding whether to apply both the proposed and our suggested reporting metrics will be the ability to compare the outcomes for customers affected by family violence with those for the broader consumer base. This comparison may provide an indication of whether the current protections for customers affected by family violence are working or not and whether any further specific protections are necessary for these customers.

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](mailto:antony.clarke@ewosa.com.au) or on (08) 8216 1861.

Yours sincerely



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