



Natasha Cheshire
Executive Director – Consumer Protection and Pricing
Essential Services Commission of South Australia
GPO Box 2605
Adelaide SA 5001

By email reviews@escosa.sa.gov.au

15 December 2025

Dear Natasha,

**Submission to the Essential Services Commission of South Australia:
SA Water Regulatory Determination 2028-32 – Framework and Approach**

The Energy and Water Ombudsman (SA) Limited (EWOSA) welcomes the opportunity to submit to the Essential Services Commission of South Australia (Commission) on the Framework and Approach Consultation Paper for the SA Water Regulatory Determination 2028-2032 (SAWRD28).

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.

We support the Commission's proposal that SAWRD28 should challenge SA Water to:

- provide water and sewerage services at the lowest sustainable price for the quality and reliability levels of service valued by customers now and into the future
- have in place sound long-term asset management plans and operating and financing strategies
- demonstrate how its current and planned operational and investment decisions align with, and will support, long-term asset health and **positive** customer outcomes.

Please note that we suggest adding the word “positive” in front of customer outcomes, mainly to ensure that delivering good outcomes for customers is front and centre of what SA Water does and its considerations. To this end, we support the Commission reviewing the Water Retail Code – Major Retailers (Code), as part of the regulatory determination process.

We support the Commission extending the period that the regulatory determination process is intended to take and having a staged approach. This will provide stakeholders with better opportunities to comment on issues that are important to them and for SA Water to engage effectively with such stakeholders as it develops the regulatory business plan for 2028-32. It will also provide SA Water with more time to respond to information requests from the Commission.

Regarding providing SA Water with more time, we suggest that consulting on the monitoring and reporting framework to apply to SA Water – Stage 5 of the proposed SAWRD28 process – be brought forward. This is so that SA Water has enough time before the commencement of the next regulatory period to make the changes necessary to its reporting processes, including preparing for the collection of relevant data. We note a recent example of a Customer Service Incentive Scheme not being introduced for SA Power Networks for their 2025-30 Regulatory Determination, due primarily to data issues.

Our only other suggested change to the proposed process and six stages outlined in the Consultation Paper would be to not release more than one Issues Paper or Draft Decision at a time – staggering their release (even just one month apart) would be helpful for stakeholders, many of whom have limited resources.

We support all of the focus areas that are listed for SAWRD28 in Sections 1.7 and 11 of the Consultation Paper. Our three suggested additions for focus in the consumer protections review are:

- water leakages and other supply issues
- possible rollout of smart meters (which may already be considered as part of a cost-benefit analysis of individual metering)
- assistance and other protections for customers experiencing payment difficulties.

In the first eleven months of 2025, complaints to EWOSA about SA Water supply issues – particularly water leaks and sewerage blockages or overflows – more than doubled to 125, compared to each of the full 2023 and 2024 calendar years, at 57 and 58 complaints respectively. This is a concerning trend that requires attention.

Billing complaints about SA Water have also increased significantly in 2025, driven mainly by complaints about high bills and estimated bills, including inconsistent billing periods. Billing and supply complaints accounted for around 80% of all complaints that EWOSA received about SA Water in the first eleven months of 2025.

While consultation on Stage 3 – Consumer Protections will be the appropriate time to detail suggestions or recommendations for improvements to the Code and proposals for capital expenditure to improve service standards, we note that benefits from smart meters could include:

- remote meter reading, which would reduce meter reading costs for SA Water, as well as reduce the number of complaints received by EWOSA about issues associated with meter reading problems, such as estimated bills
- providing customers with water consumption information which could improve water use efficiency
- providing possible early indication of leaks
- improved customer service.

Since the beginning of April 2025, EWOSA has surveyed energy and water customers who have complaints resolved by our office about the key issues affecting them. With regards to water, the three main concerns have consistently been:

- being able to afford your bills
- customer service from your provider
- knowing where to get trusted information.

These responses also provide insights on what some of the priorities should be for SA Water and the regulatory determination process. A focus on service standards is therefore supported and there may be areas within the Code where it would be possible to improve information provision for water consumers.

We support the updated requirement proposed for SAWRD28 that SA Water provide an “Expenditure and Revenue Justification Statement.” This is likely to make assessing whether expenditure is prudent and efficient easier and more comprehensive, as well as encourage greater engagement with and feedback from stakeholders.

Regarding SA Water’s stakeholder engagement, we would like to see a wider representation of stakeholders, both in terms of key consumer-related bodies and individuals with lived experience. We note that SA Power Networks has a number of advisory groups related to different issues and this may be a beneficial approach for both SA Water and stakeholders. SA Water released a Stakeholder Engagement Framework in June 2025, which is available on its website, which may result in enhanced stakeholder feedback during the SAWRD28 process.

The definition of a key stakeholder in SA Water’s Stakeholder Engagement Framework “... is anyone who may influence, be affected or impacted by us, or have an interest in our strategic goals, future plans and/or operations.” Given EWOSA’s role in resolving complaints between SA Water and its customers, we have a strong interest in participating directly in SA Water’s engagement processes and joining any consultative group that may be established to provide input and feedback on developing their business proposal for the next regulatory period.

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 Manager