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12 November 2025

Dear Rowan,

**Submission to the Essential Services Commission of South Australia:  
Review of the Small-Scale Water Regulatory Framework**

The Energy and Water Ombudsman (SA) Limited (EWOSA) welcomes the opportunity to submit to the Essential Services Commission of South Australia (Commission) on the Issues Paper for the Review of the Small-Scale Water Regulatory Framework (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.

The Review is timely, given that the Water Retail Code – Minor and Intermediate Retailers (Code) has not been updated since 2015 and the Verified Trust and Accountability (VTA) approach to regulating small-scale water providers has been in place for around three years. There have been a number of changes to rules and regulations for other providers of essential services, including the implementation of family and domestic violence protections and improved protections for tenants and consumers experiencing affordability issues. We consider it appropriate that the regulatory framework applying to small-scale water providers in South Australia be updated accordingly.

We note that the focus of the Review is on the Code's consumer protections and the price determination. We believe changes can be made to these instruments that will improve outcomes for customers of small-scale water providers. However, as will be seen from the comments below, we also believe that changes can be made to the reporting requirements on small-scale water providers, the public reporting by the Commission and the VTA approach that will likewise improve outcomes for these customers, or at least assist in the identification of risks and their scale that could impact consumers.

Our submission first summarises the recommendations we make regarding the small-scale water regulatory framework. It then provides an overview of the cases EWOSA receives about small-scale water providers, highlighting key data and some of the major issues we observe. We subsequently use these insights and our views on consumer protections to respond to many of the questions posed in the Issues Paper.

## Summary of Recommendations

EWOSA recommends that the Commission:

1. Strengthen and apply more targeted monitoring, compliance and enforcement which focuses on those small-scale water providers that are not always providing an acceptable level of service – this may include some small-scale water providers who are not listed as a Category B provider.
2. Resume monitoring levels of small-scale water providers' self-reported compliance with the NWI pricing principles.
3. Amend the price determination to provide the Commission with the option to approve small-scale water providers' price schedules.
4. Require small-scale water providers to provide the number of customers affected when reporting on Material Service Issues and Compliance Breaches.
5. Resume publicly releasing detailed Annual Performance Reports for small-scale water providers.
6. Produce and publish fact sheets on their website to improve information provision for small-scale water customers.
7. Require small-scale water providers to include the contact details for EWOSA on their bills.
8. Require small-scale water providers to improve access to communication about services for customers with specific needs.
9. Improve requirements for actual meter reads and meter testing, including best endeavours for quarterly meter reads and no charging for meter tests and replacing the meter when the meter is faulty.
10. Require small-scale water providers to use an acceptable method for estimating meter reads, which could include a documented self-read from the customer.
11. Reduce the timeframe for recovery of undercharged amounts due to retailer error from twelve months to nine months.
12. Impose a best endeavours requirement on small-scale water providers to alert customers to a potential leak when they become aware of significantly higher than usual water usage.
13. Extend consumer protections to tenants where possible.
14. Improve protections for customers experiencing affordability issues, by considering how the observations made by the Australian Energy Regulator in their "Review of Payment Difficulty Protections in the NECF" could be applied to small-scale water providers in South Australia.
15. Introduce new protections for customers experiencing family and domestic violence, based on those required of SA Water.
16. Either facilitate family and domestic violence training for small-scale water providers and/or ask the Local Government Association to facilitate such training for both Councils and private small-scale water providers, particularly where the geography is accommodating.
17. Change the life support equipment definition, as suggested in the Issues Paper.
18. Improve registration and deregistration processes for life support customers.
19. Provide recommendations to, or make observations for, the State Government to consider, regarding a full implementation of the Statewide Pricing Policy.

## EWOSA Cases

The number of cases EWOSA has received about small-scale water providers has increased over the last few financial years, with a 30% rise to 69 cases in 2024-25 (see the table below). However, this needs to be placed in context, with these cases accounting for just over 10% of all water cases (with SA Water being almost 90%) and less than 1% of all cases that EWOSA received in 2024-25.

	Small-Scale Water Cases			Total Water Cases	Total EWOSA Cases
	Complaints	Enquiries	Total		
2022-23	19	27	46	443	7,853
2023-24	18	35	53	511	9,565
2024-25	27	42	69	645	9,289

As mentioned in the Issues Paper, enquiries account for a much higher proportion of total cases for small-scale water providers than for SA Water. In 2024-25, enquiries accounted for around 60% of all small-scale water cases, compared to 30% for SA Water. We will discuss this in more detail in our response to the relevant questions below.

Of the 64 small-scale water Members EWOSA has, only 8 registered complaints in 2024-25. Fourteen complaints were made against four private small-scale water providers and 13 complaints were made against four Councils.

Billing accounted for two thirds of small-scale water provider complaints in 2024-25, which is consistent with our complaints data across electricity and gas as well, followed by Supply (almost 19%) and Provision (7%).

Escalated Referrals accounted for almost half of the complaints in 2024-25, followed by Investigations (22%), Referrals to Customer Service (almost 19%) and Explanations of Outcome (11%)<sup>1</sup>.

Further detail on our cases is provided where relevant in the responses to the questions posed in the Issues Paper below.

## Responses to the Issues Paper

What do you think are the most important risks faced by customers or consumers of small-scale water and sewerage retailers? Why? How do you think they can they be managed?

Based on our cases and complaints data, EWOSA considers the most important risks faced by customers of small-scale water providers to be:

- billing issues, such as high bills, incorrect bill calculations and meter read accuracy
- issues associated with water supply, including leakages and allowances
- issues with new connections, such as delays
- having easy to access and easy to understand information, as evidenced by the relatively high proportion of enquiries received by EWOSA.

However, we do not consider these risks to be particularly widespread across providers. As referenced above, only one in eight small-scale water providers had complaints made against them in 2024-25, so the risks are more likely to be related to specific providers rather than sector-wide.

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<sup>1</sup> EWOSA has a complaint escalation process where: Referrals to Customer Service occur when a customer has not yet contacted their provider and we encourage them to speak with their provider to resolve the issue; Escalated Referrals occur when a customer has contacted their provider and the issue isn't resolved and we refer the complaint to the provider's senior complaints team; Investigations occur when the issue hasn't been resolved at earlier steps and a Dispute Resolution Officer is assigned to investigate the case, collecting information from both the customer and the provider; Explanations of Outcome occur when a review shows the provider has acted reasonably and no further investigation is warranted and we explain our decision and reasoning to the customer.

An important part of the VTA approach to regulating small-scale water providers involves categorising small-scale networks according to risk. While there is some consistency between this categorisation and the complaints that EWOSA receives, not all higher risk providers had complaints made against them and a few lower risk providers had complaints made against them.

While we generally support the VTA approach, we believe strengthened and more targeted monitoring, compliance and enforcement which focuses on those operators that are not always providing an acceptable level of service would be appropriate. This may include those small-scale water providers who are not listed as a Category B provider. This would minimise the harms to consumers most likely to be impacted and keep costs down for providers who are complying with their obligations, compared to a more stringent regulatory framework which affects all providers. We note that the Commission has scope to conduct price determinations for small-scale water providers and has done so for one provider.

We note that the reporting proformas that form part of “Bulletin No. 5 – Templates and Forms” do not specifically ask the small-scale water provider for the number of customers affected when reporting on Material Service Issues (Proforma AR5) and Compliance Breaches (Proforma AR6). We suggest that this information be required when these are reported on in future. This will help to measure the magnitude of any material service issues and compliance breaches and contribute to appropriately responding to and managing risks that arise from these issues and breaches.

A significant concern that we have identified from the Commission’s regulatory performance outcomes reporting is the substantial reduction in the number of customers participating in financial hardship programs and on flexible payment arrangements between the end of June 2023 and the end of June 2024. These numbers fell from 937 to 276 and from 2,245 to 1,907, respectively<sup>2</sup>. At a time when cost of living pressures are impacting many households, there is a risk that a reduction in these support measures is leading to major harm for some consumers and it raises questions about how well small-scale water providers are managing customers experiencing affordability issues. This is an area where more investigation behind the data is necessary and additional protections and monitoring may be required.

We note that Proforma AR3 Hardship in “Bulletin No. 5 – Templates and Forms” requires small-scale water providers to report on the “number of residential customers who successfully exited the financial hardship program during the year”. We suggest this be publicly reported on by the Commission to help stakeholders understand how well small-scale water providers are managing customers experiencing affordability issues. We also ask the Commission to require that the information requested in Proforma AR3 be reported on by small-scale water providers who are identified as more risky (Category B providers at a minimum), rather than the data be provided only if available. This may add to the costs of these providers, but it is probably necessary to ensure that customers don’t experience unnecessary harms.

The Commission stopped publicly producing detailed Annual Performance Reports for small-scale water providers in 2019-20. We suggest these be resumed, to provide stakeholders with better insights about the performance and compliance of these operators and what risks customers might be facing.

We are also aware that the Commission initiated a Small-Scale Networks Assessment project in April 2025. This will evaluate how well water and sewerage infrastructure is maintained, the quality of asset management and the adequacy of funding for small-scale water providers. The outcomes of this work will be important in determining whether any changes to reporting requirements and the VTA approach are necessary.

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<sup>2</sup> <https://www.escosa.sa.gov.au/industry/water/regulatory-performance/small-scale>

Aside from insights from our own cases and the Commission's performance monitoring, we note recent Briefings (released in August 2025) by the South Australian Council of Social Service (SACOSS) on water issues, regarding both pricing and a basic level service in remote and regional areas<sup>3</sup>. We share the concerns about high water and sewerage service prices for some customers and it is likely that these have contributed to some of the high bills complaints that EWOSA has received. We support the SACOSS recommendations for the Statewide Pricing Policy to cover remote and regional customers, as well as how to implement it.

However, we acknowledge that government policy regarding water pricing is not within the Commission's scope. Nevertheless, it is possible for the Commission to impose a price determination on a provider not operating in the long-term interests of South Australian consumers with respect to the price, quality and reliability of water retail services and we suggest the Commission consider applying price determinations to more providers where appropriate. We also suggest that the Commission provide recommendations to, or make observations for, the State Government to consider, regarding a full implementation of the Statewide Pricing Policy, as part of the final decision for this Review.

Are there opportunities to improve the outcomes of the Commission's small-scale water regulatory framework, or reduce its costs? What are they?

We believe there are opportunities to improve the customer outcomes of the small-scale water regulatory framework in ways where the benefits are likely to outweigh the costs, including:

- improving information provision to customers
- improving requirements around billing and metering
- extending consumer protections to tenants where possible
- improving protections for customers experiencing affordability issues
- new protections for customers experiencing family and domestic violence
- enhanced performance reporting by the Commission
- more targeted monitoring, compliance and enforcement, which focuses on those operators that are not always providing an acceptable level of service.

Many of these options are discussed in more detail below in our responses to some of the questions posed in the Issues Paper and the latter two points were discussed above.

Do you think the requirements of the regulatory framework should be the same for all small-scale entities, or vary depending on, for example, certain features, such as the types of services they provide?

We generally believe the minimum requirements of the regulatory framework should be the same for all small-scale water providers, but with a more targeted monitoring, compliance and enforcement approach which focuses on those operators that are not always providing an acceptable level of service.

However, there is a case for some of the more onerous and non-vital requirements to not apply to some very small small-scale water providers – those with less than 100 connections that are Category A providers. None of the very small providers in the list of small-scale water providers in Appendix 3 of the Issues Paper registered either an enquiry or a complaint against them among EWOSA's cases for the last two financial years. Nevertheless, we consider the proposed requirement for EWOSA's contact details to be on bills should also apply to these providers, so that consumers know their options if a complaint has not been resolved.

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<sup>3</sup> <https://sacoss.org.au/publications/?e-filter-b25dd9e-category=water>

Do you support the current principles-based approach to the economic regulation for small-scale water retailers? Why or why not?

We generally support the current principles-based approach to economic regulation. As alluded to above, EWOSA's cases indicate that only a small proportion of small-scale water providers have complaints made about them. A prescriptive approach to pricing or revenue regulation may impose higher costs than necessary to achieve similar outcomes for consumers, particularly on those providers that are already complying with the regulatory framework. No formal economic regulation would be inappropriate, given the risk that this would impose significant harms on customers.

Given the performance reporting, monitoring and compliance undertaken by the Commission – which we believe could be more targeted at small-scale water providers not providing an acceptable level of service and strengthened when necessary – consumer harms can be reduced with appropriate enforcement, including price determinations.

We note that the price determination applying to small-scale water providers does not provide for the Commission to approve price schedules. We believe amending the price determination to allow for this could improve price outcomes for customers, by providing an incentive for providers to not set prices too high. This would not mean that the Commission would have to approve all price schedules, but it would provide the option, particularly regarding small-scale water providers listed as Category B, or those with substantially higher prices than other providers.

Do you have feedback on using the NWI pricing principles to guide the development of small-scale retailers' water and sewerage prices?

EWOSA does not oppose the use of the NWI pricing principles to guide small-scale water providers in the setting of water and sewerage prices, but we do have some concerns.

It is important to note that the NWI pricing principles apply for urban water tariffs (Table 2 in the Commission's Water Fact Sheet – Pricing Principles Guidance).<sup>4</sup> This raises the question of whether the NWI pricing principles are appropriate for small-scale water providers in regional and remote areas, where the customer base may be relatively dispersed and capital costs per customer may be very high. The application of the NWI pricing principles could be contributing to the high price outcomes for some consumers in these areas, as highlighted in the SACOSS research cited previously. Conversely, as mentioned in the Issues Paper (page 18), some retailers have reported "difficulty in achieving full cost recovery due to a small customer base and/or customers' capacity to pay." This can lead to underinvestment and declining service levels.

Regarding NWI pricing principle 7: Differential water charges in Table 2 (referenced above), we believe that this principle should not apply when small-scale water providers set prices for the same class of customers, such as residential customers. This is for equity reasons and reflects our view that the Statewide Pricing Policy should also apply to customers served by small-scale water providers.

The use of NWI pricing principles would be more palatable if the Commission provides itself with the option to approve price schedules and the South Australian Government implements a Statewide Pricing Policy that applies to all customers.

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<sup>4</sup> <https://www.escosa.sa.gov.au/ArticleDocuments/186/20220531-Water-NWIPricingPrinciplesFactSheet.pdf.aspx?Embed=Y>

We would support the Commission resuming monitoring levels of self-reported compliance with the NWI pricing principles, particularly for those small-scale water providers in Category B. There would be some consistency with this approach and the possible approving of price schedules.

Do you have any suggestions about improvements to the model customer charters and model standard contracts included in the Code?

EWOSA believes that part of the “Complaints and dispute resolution” section of the model customer charters need clarifying, with the deletion of both the “[remove if you are not a member of this scheme]” in the third dot point and the entire fourth dot point, given that all small-scale water providers are required to be members of Energy and Water Ombudsman SA. There are also numerous clauses within the standard customer sale contract that require similar clarification (e.g. clauses 17.5, 24.1(b)(vi), 24.2(b)(v), 25.1(g) and 28.4).

Our only other comment on the model customer charters and model standard contracts are to update them to reflect changes that are proposed for the Code or our recommendations, if they are made, such as reducing the timeframe for small-scale water providers to recover undercharging from twelve months to nine months.

Are customers and consumers satisfied with the reliability and quality of services provided by small-scale retailers? If not, what improvements would customers and consumers value and be willing to pay for?

EWOSA receives very few complaints and enquiries about the reliability and quality of water and sewerage services provided by small-scale water providers. Importantly, the five Supply complaints in 2024-25 were about just two providers. So we would generally say that customers are satisfied with this aspect of their service.

That said, when something does go wrong in terms of reliability and quality, such as an unplanned interruption, water leakage or sewerage overflow, the impacts on customers can be significant. It is important that providers have good systems and procedures in place to ensure that they can respond appropriately when these problems occur.

Do you think the high proportion of enquiries in EWOSA cases reflects a low level of awareness about the protections available to customers and consumers of small-scale retailers? Why or why not?

EWOSA believes that the relatively high proportion of enquiries in total cases that our office receives associated with small-scale water providers reflects a lower level of awareness among customers of the protections available, including dispute resolution.

Some of the enquiries received reflects confusion for customers of Councils about who they should contact to make a complaint – EWOSA or Ombudsman SA or some other agency. If the enquiry is not related to water and/or sewerage services, we will advise the customer to contact Ombudsman SA.

Some of the enquiries received are about water pricing, over which EWOSA does not have jurisdiction. Other issues enquired about include water leaks and metering.

Do customers and consumers need more information about key protections available to customers or consumers of small-scale retailers (for example, about billing or hardship support)? What sort of information do they need?

Easy to access and easy to understand information is more important for customers than more information. This might take the form of:

- simple one or two page fact sheets, easily accessible on small-scale water providers' websites and/or the Commission's website, including an overview fact sheet, with links to others on specific issues, such as billing, hardship support, dispute resolution and metering
- concise information on bills, including EWOSA's contact details and the circumstances in which to contact our office.

We note that many small-scale water providers already do have important documents available on their websites, such as their Customer Charter, Standard Water Contracts, Pricing Policy and Pricing Schedule, Hardship Policy and Customer Enquiries and Dispute Resolution Process.

Would small-scale retailers, customers and consumers value some information being provided by the Commission as a series of fact sheets?

We believe a series of fact sheets provided by the Commission would be useful, particularly for customers of small-scale water providers. This may also reduce the number of documents that small-scale water providers need to maintain on their own websites.

What barriers do customers or consumers of small-scale retailers face in accessing or understanding information? How might they be overcome?

As mentioned in the Issues Paper, low levels of literacy or disability or impairment can result in barriers to customers of small-scale water providers accessing or understanding information.

We support a requirement in the Code on small-scale water providers to improve access to communication about services for customers with specific needs.

Would retailers face any practical difficulties or costs if required to include EWOSA contact details on bills? How could these be addressed?

It is likely that small-scale water providers would face a small once-off cost to updating their billing format to include EWOSA's contact details on bills. However, given that other changes to billing contents and requirements are likely to eventuate from this Review, this would be a very small additional cost that would be outweighed by the benefits to customers. Costs of this requirement could be minimised by requiring all changes to billing formats simultaneously.

Are you aware of cases where bills are issued for metered supply, but retailers do not regularly conduct meter reads? Why might retailers delay meter reads? How does this impact customers?

A significant concern with one small-scale water provider is incorrect or inconsistent bill calculations and the accuracy of meter reads. It is sometimes unclear whether the meter reads are actual or estimated and bills can vary substantially from quarter to quarter. This has a significant impact on customers – they don't know what amount to pay, they lose confidence and trust in their provider and customer service has been an issue in a number of cases.

Other cases EWOSA has received also indicate issues with the accuracy of meter reads, higher than expected bills and the lack of information provided to customers when they ask for explanations.

We suggest the Commission include strengthened requirements for actual meter reads and meter testing in the Code. This should include:

- a best endeavours requirement to read meters on a quarterly basis
- a definitive requirement that meters are read once every twelve months
- where meter tests reveal a faulty meter, the meter test should be free to the customer and the meter should be replaced at no cost to the customer (unless the meter has been tampered with).

How do retailers estimate bills when they do not have an actual meter read? Why do retailers use those methods? How does this impact customers?

EWOSA is unaware of the methods small-scale water providers use to estimate bills when they do not have an actual meter read. However, as alluded to above, concerns about meter reads being incorrect and the accuracy of bills leads to confusion and mistrust.

We support the Commission requiring some kind of uniform methodology for estimating meter reads or water consumption or a number of acceptable options, to provide flexibility for small-scale water providers. This could include a documented self-read of the meter from the customer.

Do you have any concerns about how retailers manage under- or over-charged amounts? Do you think reducing the timeframe for recovery of undercharged amounts due to retailer error would assist customers? Why or why not?

EWOSA supports a reduction in the timeframe for recovery of undercharged amounts due to retailer error from twelve months to nine months. As mentioned in the Issues Paper, this would bring this protection into line with customers of SA Water, authorised energy retailers and with the small-scale providers of other essential services in South Australia. This would assist customers by reducing the amount of any debt that has built up due to retailer error and may reduce bad and doubtful debt costs for providers.

Do you have other concerns or comments about billing for water and sewerage services by small-scale retailers?

An additional concern we have about the practices of two private small-scale water providers regards the provision of bills or invoices to customers for supposed unpaid charges that are a few years old. There are also sometimes issues with customer service and the length of time taken to resolve such complaints for the customer.

One issue that can have significant detriment for customers are high bills that are the result of a leak on the customer's side of the meter. While the leak is required to be fixed by the customer and there is no fault on the part of the small-scale water provider, leaks can result in substantially higher bills, as well as other expenses, for customers.

We suggest the Commission impose a best endeavours requirement on small-scale water providers to alert customers to a potential leak when they become aware of significantly higher than usual water usage.

Do you support extending protections for tenants as consumers of small-scale retailers' services, where consistent with the legal framework established by the WI Act? Why or why not?

EWOSA supports extending protections for tenants as consumers of small-scale water providers where possible. We believe tenants should have the same protections as landholders. There is also no reason that tenants who receive services from small-scale water providers should have lesser protections than those who receive services from SA Water, except perhaps in a few limited circumstances where the costs may outweigh the benefits.

How could small-scale retailers better support customers experiencing financial hardship or payment difficulties? What practical difficulties or costs would retailers face in doing so?

As discussed above, the Commission reported that the number of customers participating in financial hardship programs and on flexible payment arrangements fell significantly between the end of June 2023 and the end of June 2024. Given cost of living pressures, there is a concern that this drop does not reflect customers successfully exiting hardship programs or completing flexible payment arrangements and it raises questions about how well small-scale water providers are managing customers experiencing affordability issues. This is an area where more investigation behind the data is necessary and additional protections and monitoring may be required.

The Australian Energy Regulator (AER) “Review of Payment Difficulty Protections in the NECF”<sup>5</sup> outlines some useful insights into what sort of changes may be required in payment difficulty frameworks to generate improvements from providers of essential services to better support customers experiencing affordability issues. These include:

- making it easier to know who should be receiving assistance
- making it easier for customers to know what assistance is available
- making it easier for customers to access assistance
- making assistance more effective
- making sure disconnection (and restriction in the case of water) is only used as a last resort
- reducing the harm caused by disconnection (and restriction).

We suggest that the Commission consider the outcomes of the AER review and how these could be applied to small-scale water providers in South Australia.

When is the right time for small-scale retailers to identify and intervene to support customers experiencing financial hardship? Why?

We don’t believe that there is a one-size-fits-all approach to the timing for support, but sooner is better than later, so that customers are less likely to build up debt to unmanageable levels.

Do you support introduction of family violence consumer protections for customers of small-scale retailers? Why or why not?

EWOSA supports the introduction of family and domestic violence consumer protections for customers of small-scale water providers. As discussed in the Issues Paper, perpetrators of family and domestic violence can use essential services to cause harm to victim-survivors, which is completely unacceptable. We believe all customers of essential services should have access to these protections and we note that such protections have expanded from being required of energy retailers, to SA Water and shortly will apply to operators of embedded networks (1 January 2026).

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<sup>5</sup> <https://www.aer.gov.au/industry/registers/resources/reviews/review-payment-difficulty-protections-national-energy-customer-framework/final-report>

What sort of consumer protections should small-scale water retailers offer people who are experiencing family violence? Why?

We believe all of the consumer protections for customers experiencing family and domestic violence that apply to SA Water should also apply to small-scale water providers. This is particularly the case for Councils, who may already have similar obligations for ratepayers.

SA Water is required to:

- have and implement a family violence policy for customers
- provide staff training to help staff detect and assist impacted customers
- adopt processes that avoid repeat disclosures of family violence and evidence requirements
- implement confidentiality and account security procedures to ensure secure handling of customer information
- consider its approach to debt management and recovery
- provide information on external family violence services that can be accessed for support.

Staff training may be difficult for some of the small and very small small-scale water providers and we suggest that the Commission either facilitate training for such providers or that the Local Government Association be asked to facilitate training for both Councils and private small-scale water providers, particularly where the geography is accommodating.

Can you foresee any practical difficulties in using a definition of life support equipment that includes any equipment that a medical practitioner certifies is required (rather than equipment as notified by the Commission from time to time)? What are they?

We believe changing the definition of life support equipment to include "...any other equipment that a registered medical practitioner certifies is required...", rather than "other equipment as notified by the Commission from time to time", is sensible and we don't foresee any practical difficulties with this change.

Are there any other protections required for customers or consumers that use life support equipment? What are they and why?

EWOSA believes that appropriate processes for registering and deregistering customers requiring life support equipment are necessary and will provide a more detailed response on this to the Commission in the separate consultation to be undertaken later in the year.

Notifications of planned interruptions to customers that use life support equipment are vital and we support the existing requirements.

Do you think customers or consumers who require water for other special needs related to disability or medical conditions should have similar protections to those who require water for life support equipment? Why or why not?

We generally do not support similar protections for customers with disability or medical conditions that are not related to life support equipment, due partly to the costs involved of maintaining registers and notifying such customers of interruptions. Defining the disabilities or medical conditions that qualify for such protections is a difficult task that risks discrimination (and accusations of discrimination).

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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