



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](http://ewosa.com.au)

Adam Wilson  
Chief Executive Officer  
Essential Services Commission of South Australia  
GPO Box 2605  
Adelaide SA 5001

By email [reviews@escosa.sa.gov.au](mailto:reviews@escosa.sa.gov.au)

11 March 2026

Dear Adam,

**Submission to the Essential Services Commission of South Australia:  
Robusto Investments 2026 Regulatory Determination**

The Energy and Water Ombudsman (SA) Limited (EWOSA) welcomes the opportunity to submit to the Essential Services Commission of South Australia (Commission) on the first stage of the Robusto Investments 2026 Regulatory Determination.

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.

Our submission provides broad discussion about our case data as it relates to Robusto Investments, for the Commission to consider as it so wishes. We make no direct comments on pricing or the Robusto Investments Proposal itself.

Please note that EWOSA provided a submission to the Commission on the Issues Paper of its Review of the Small-Scale Water and Sewerage Regulatory Framework in November 2025, some of which may be relevant for the Commission.

Between the beginning of 2019 and the end of February 2026, EWOSA received 90 cases about Robusto Investments. There were 37 complaints (41% of the total) and 53 enquiries (59% of the total).

Robusto Investments accounted for around one quarter of the complaints EWOSA received about small-scale water providers over that period.

In February 2026 alone, our office received 35 cases about Robusto Investments. This is 39% of the total since the beginning of 2019. However, all but one of these cases were enquiries related to the Proposal provided to the customers of Robusto Investments, for both information and feedback, during that month. The proposed and possible increases in the quarterly supply charge over the next two financial years was the major concern raised by customers of Robusto Investments in these enquiries. There was also concern about the potential for Robusto Investments to recover legal costs from customers.

EWOSA's dispute resolution officers explained to these customers that pricing is not within the Ombudsman's jurisdiction and advised them to contact both Robusto Investments and the Commission with their concerns, noting also that the regulatory determination process is underway. EWOSA continued to receive these enquiries in March.

Without this "anomaly" in February 2026, complaints accounted for 65% of the 55 Robusto Investment cases received between the beginning of 2019 and the end of January 2026.

Billing accounted for 61% of the complaints received between the beginning of 2019 and the end of January 2026. Backbilling and high bills were major concerns, as were problems associated with meter readings, such as billing errors and estimated bills.

Marketing complaints accounted for almost 14% of the complaints. These mainly related to the application of contract terms.

Supply issues and customer service complaints each accounted for 8% of the complaints. Customer service issues centred around the failure of the provider to respond to customers. This was also a secondary issue in a number of billing complaints.

Credit issues accounted for almost 6% of the complaints.

Over 8% of the complaints received about Robusto Investments required Investigation by our office. By way of comparison, 5.5% of the total complaints received by EWOSA in 2025 required Investigation.

A further 19% of complaints about Robusto Investments were resolved at the Early Resolution or Conciliation level, where dispute resolution officers facilitate an agreed resolution between the customer and the provider. This compares to 8.5% of the total complaints received by EWOSA in 2025 being resolved at the Early Resolution level.

However, it should be noted that the proportion of complaints about Robusto Investments requiring case management by the Ombudsman has trended downwards over time.

Thank you for consideration of this submission. Should you require further information, such as more detail on complaints data or cases, 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



Antony Clarke  
Policy and Governance Manager