



ENERGY & WATER
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Mr Sebastian Roberts
General Manager
Australian Energy Regulator
GPO Box 520
Melbourne, Victoria, 3001

Submitted electronically AGNSA2021@aer.gov.au

21 January 2021

Dear Mr Roberts,

Submission to the Australian Energy Regulator's ("the AER") Consultation on the Australian Gas Network ("AGN") SA Draft Determination and Revised Access Arrangement 2021-26 ("Revised Access Arrangement")

The Energy and Water Ombudsman (SA) Limited ("EWOSA") welcomes the opportunity to comment on the AGN SA Revised Access Arrangement.

EWOSA is an 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.

Background

EWOSA has welcomed involvement in the co-design workshops focussed on vulnerability as part of AGN's development of its Draft Plan. EWOSA submitted to the Draft Plan in support of the AGN proposal to develop a Vulnerable Customer Assistance Program (VCAP).

In its Draft Plan, AGN noted that opportunities to support vulnerable customers which AGN were considering include:

- A priority services register that allows AGN to proactively contact customers in circumstances such as outages
- Rebates or discounts for connection fees or plumbing assistance
- Policy advocacy for vulnerable customers
- Specialised training programs for customer facing service roles.

EWOSA submitted to AGN that all of these initiatives would be valuable in supporting those most vulnerable in our community. We see much evidence of the challenges some customers are facing in South Australia and believe that supporting vulnerable customers is a high priority for the energy and water sector.

In response to the Access Arrangement, EWOSA strongly supported the proposal to provide for a VCAP.

Submissions

EWOSA receives complaints and disputes between consumers of electricity, gas and water services and members of the Scheme. AGN is a member of EWOSA.

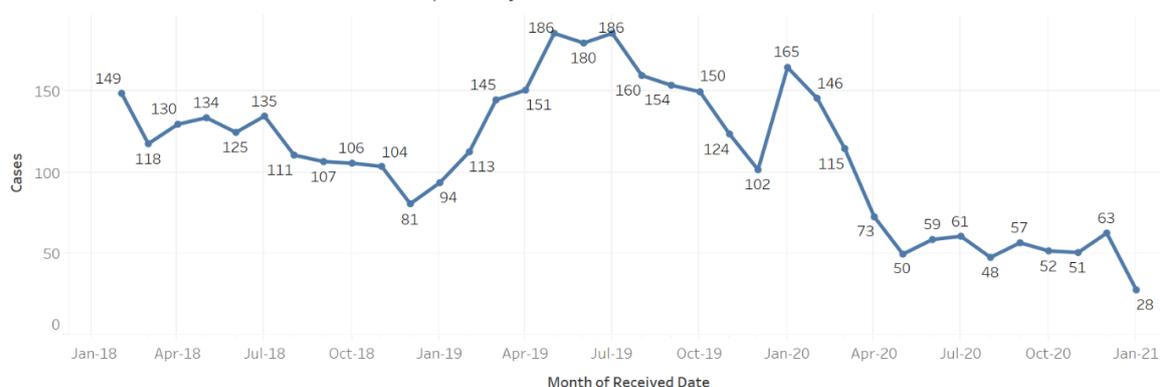
EWOSA receives cases in the following broad issue categories:

Case Issue
Billing
Credit Management
Customer Service
General Enquiry
Land
Provision
Sales & Marketing
Supply Quality

Table 1: Case issues received by EWOSA

Of particular note in the case issues are the Credit Management cases which include the following sub-issues: Credit Action Disputed Liability, Credit Action Taken in Error, Financial Hardship, Disconnection (including imminent) and Security Deposit. The figure below shows Credit Management cases received each month over the past three years. It is noted that a significant number of Credit Management cases are received by the Scheme each month, which indicates our detailed understanding of vulnerable customer issues.

Cases Received - each month over the past 3 years



VCAP

AGN has undertaken a very extensive engagement program and is to be commended for its efforts in this regard. Following the release of the Draft Determination, EWOSA participated in a dedicated workshop hosted by AGN to focus on the VCAP. EWOSA observed that the workshop was well facilitated and attended by AGN leadership and senior staff. The workshop involved a lot of questioning and commentary from participants and AGN appeared well equipped to respond to issues raised.

EWOSA continues to be highly supportive of AGN's proposed VCAP. We believe that having a dedicated vulnerable customer service role within AGN will ensure the necessary priority is given to vulnerable customers. We support the proposal to include policy development as part of this service role, given the interplay between customer experience and the

development of leading practice policy. This is an interplay we are very familiar with at EWOSA, as we use the insights we gain through our interactions with customers to inform and shape policy development. We have found that it is invaluable to have coal face knowledge feeding up into policy formation. The ability for the role to enable policy advocacy will also be an important means for AGIG to role model the shaping of policy for vulnerable customers at network level nationally.

We support:

- the development of a priority services register as a means of targeting support
- gas safety appliance checks and emergency appliance repairs
- financial support to help access to more efficient appliances.

Through these initiatives, AGIG is expected to deliver an increased level of service for vulnerable customers. The register will facilitate better, more tailored customer service for this cohort and the checks, repairs and appliance support will help enable vulnerable customers to participate safely in the market and find ways to save money on their energy bills.

There are a significant number of customers who do not successfully complete hardship programs and who are in a cycle of disconnections. These customers present to EWOSA regularly and there are times when the only way we can support these customers is to provide them with referrals. Having additional referral options such as those being proposed by AGIG will provide enhanced means to support these customers.

We note that a question was raised at the VCAP workshop about whether there is any duplication with other third party initiatives. We have an in depth understanding of the industry due to our unique relationship with government, energy providers (including retailers) and customers and we do not perceive any duplication.

Thank you for consideration of this submission. Should you require further information or have any enquiries in relation to this submission, please contact 

Yours sincerely,



Jo De Silva
Policy and Communications Lead
Energy and Water Ombudsman SA