



ENERGY & WATER
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Mr Chris Pattas
General Manager, Networks
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

12 January 2018

Dear Mr Pattas

**Submission to the Australian Energy Regulator (AER):
Draft Electricity NSP Registration Exemption Guideline**

The Energy and Water Ombudsman (SA) Limited ("EWOSA") welcomes the opportunity to comment on the Australian Energy Regulator's *Draft Electricity Network Service Provider Registration Exemption Guideline*.

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.

We appreciate the collaborative work the AER is doing with the Australia and New Zealand Energy and Water Ombudsman Network on the important issue of access to dispute resolution services for exempt customers and the support the AER has for Ombudsmen.

We support the drafted amendments to the Electricity Network Service Provider Registration Exemption Guideline (Network Guideline) to bring the dispute resolution conditions into line with those in the Retail Exempt Selling Guideline (Retail Guideline). In particular, we support providing access to the free, fair and independent dispute resolution services of an energy Ombudsman for residential customers of exempt network operators.

Ensuring consistency between the two Guidelines also provides certainty for retail exemption holders and network exemption holders, not only about whether they are required to become a member of an Ombudsman scheme, but also with regards to the requirement to have internal dispute resolution processes in place that are consistent with the Australian Standard.

We do not believe that the restriction on meter reads to no more than once a month is necessary. Removing the restriction will allow for more flexible payment options for customers that would like such options and any additional burden for the embedded network operator and associated contractors is likely to fall over time as existing meters are replaced by advanced meters that can be remotely read.

Should you require further information or have any enquiries in relation to this submission, please email me at antony.clarke@ewosa.com.au or telephone me on (08) 8216 1851.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Antony Clarke', written in a cursive style.

Antony Clarke
Policy and Research Officer
Energy and Water Ombudsman SA