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Australian Energy Regulator
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[Emailed to AERExemptions@aer.gov.au](mailto:AERExemptions@aer.gov.au)

6 December 2022

Dear Ms Park,

Submission on the Australian Energy Regulator's Draft Network Exemption Guideline

The Energy and Water Ombudsman (SA) Limited (**Energy & Water Ombudsman SA**) welcomes the opportunity to comment on the Draft Network Exemption Guideline.

Energy & Water Ombudsman SA 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.

One of the proposed policy changes in the draft Guideline relates to an optional primary registrant model which is outlined in section 4 of the Notice of Draft document (pp 8-10).

Our preliminary view on the primary registrant model is that we can only take a complaint if the supplier is a Member of our Scheme. So, unless they have joined at the time of the complaint, it would be out of jurisdiction and we would not be able to assist.

Thank you for consideration of this submission. Should you require further information or have any enquiries in relation to this submission, please contact Jo De Silva via [REDACTED] or phone [REDACTED].

Yours sincerely,

[REDACTED]

Jo De Silva
Policy and Communications Manager