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Submitted by email to [consumerengagement@aer.gov.au](mailto:consumerengagement@aer.gov.au)

10th August 2013

Dear Mr Anderson,

**RE: AER's Draft Consumer Engagement Guideline for Service Providers**

Thank you for the opportunity to respond to your Request for submissions.

As the peak body for the community services sector in South Australia, SACOSS has a long-standing interest in the delivery of essential services and particular the cost of basic necessities like electricity and gas because they impact greatly and disproportionately on vulnerable disadvantaged people.

SACOSS is of the view that the Draft Consumer Engagement Guideline for Service Providers provides good scope for energy network service providers to better align their services with the long term interests of consumers.

SACOSS believes that the Guidelines would be improved by specific reference to affordability, which is a priority issue for energy consumers. SACOSS has heard extensively from consumers on the issue of affordability including most recently at the SACOSS Hardship and Affordability Conference, with over 100 delegates in attendance demonstrating the high priority which affordability is given amongst consumers. In relation to the Guidelines, SACOSS believes that affordability needs to be one of the best practice principles.

The Consumer Engagement Guideline is expected to lead to increased demands on consumer organisations and individuals to engage with network service providers. According to the Standing Council of Energy and Resources, the Australian Energy Consumers Organisation (AECO) is currently expected to be operational in 1 July 2014. As the AECO will be a national energy consumer advocacy body with resources for consumer engagement, and further as the AECO will have various implications for funding of existing energy advocates, it is expected that a one year review of the Consumer Engagement Guideline in conjunction with AECO and other jurisdictional advocates would be beneficial for consumers and their representatives.

We thank you in advance for your consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on 8305 4211 or via [jo@sacoss.org.au](mailto:jo@sacoss.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'RWomersley', with a large, sweeping flourish at the end.

Ross Womersley  
Executive Director