



PO Box 4136
East Richmond VIC 3121
T 131 806
F 1300 661 086
W redenergy.com.au

PO Box 632
Collins St West VIC 8007
T 1300 115 866
F 1300 136 891
W lumoenergy.com.au



05 July 2019

Mr Adam Wilson
CEO
Essential Services Commission of South Australia
Level 1, 151 Pirie Street
Adelaide SA 5000

Submitted via email

Dear Mr Wilson,

Re: ESCOSA Charter of Consultation and Regulatory Practice Review

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to provide feedback to the Essential Services Commission of South Australia (ESCOSA) on the recently released draft charter of consultation and regulatory practice (the Charter).

We welcome the release of the Charter and believe that it is both an effective and appropriate approach from ESCOSA. We believe that the Charter provides a well balanced approach to both regulation and engagement and will see effective and efficient response from the industry while still ensuring best outcomes for consumers.

Red and Lumo believe that compliance with our obligations is fundamental to our success and who we are as a company. We look forward to further understanding how ESCOSA will conduct its monitoring, oversight and enforcement of retailers compliance to our obligations through the implementation of this charter so we can continue to deliver to our compliance commitments effectively.

While we fully support the Charter being implemented as proposed we believe that the release of the Charter also provides an opportunity to further improve communication and engagement between ESCOSA and the industry. The principles based approach to stakeholder engagement and fit-for-purpose engagement should be accompanied by a briefing of industry representatives (one on one, or as a whole). This would allow fulsome discussion on how these approaches will operate in practice and ensure the industry understands the potential implications and appropriate responses.

About Red and Lumo

Red and Lumo are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in Victoria, South Australia, New South Wales and Queensland, and electricity in the ACT to over 1 million customers.

Should the ESCOSA wish to discuss or have any enquiries regarding this submission, please contact Stephen White, Regulatory Manager on 0404 819 143.

Yours sincerely



Ramy Soussou
General Manager Regulatory Affairs & Stakeholder Relations
Red Energy Pty Ltd
Lumo Energy (Australia) Pty Ltd