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Mr Nathan Petrus  
Director, Consumer Protection and Pricing  
Essential Services Commission of South Australia  
GPO Box 2605  
Adelaide SA 5001

By email [escosa@escosa.sa.gov.au](mailto:escosa@escosa.sa.gov.au)

3 December 2019

Dear Mr Petrus,

**Submission to the Essential Services Commission of South Australia (“the Commission”) Australian Gas Networks Regulatory Framework Review 2021-2026 Draft Decision**

The Energy and Water Ombudsman (SA) Limited (“EWOSA”) welcomes the opportunity to comment on the Commission’s Australian Gas Networks Regulatory Framework Review 2021-2026 Draft Decision.

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**

Australian Gas Networks’ (“AGN”) distribution services are subject to economic regulation by both the Australian Energy Regulator (“AER”) and the Commission. The Commission’s powers and functions in relation to AGN are provided in the Gas Act 1997 and the ESC Act.

The Commission has commenced the Australian Gas Networks Regulatory Framework Review 2021-2026. Through this Review, the Commission is seeking to ensure clarity, consistency and prudence in the South Australian specific requirements for AGN. The Commission is also considering its regulatory instruments in light of section 6A (4) of the Gas Act. The Review is also considering whether there is a need for AGN to be subject to jurisdictional service reliability standards.

The Commission has three main stages for the Review process. Stage 1 involved public consultation on a Consultation Paper. Stage 2 involved public consultation on a Draft Decision. The Draft Decision was released on 6 November 2019.

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## Submissions

EWOSA supports the Draft Decision and thanks the Commission for consideration of our submission on the Consultation Paper.

### ***Broader regulatory framework***

EWOSA considers that the proposed amendments to the Gas Distribution Code, Gas Metering Code, AGN's Gas Distribution Licence and Gas Industry Guideline No. 1 are appropriate.

### ***Jurisdictional service reliability standards***

EWOSA supports the Commission's proposal not to introduce jurisdictional service reliability standards in the form of performance targets.

### ***Monitoring and reporting regime***

EWOSA considers that the Commission's current performance reporting indicators are appropriate and sufficient to monitor AGN's reliability outcomes. We support the Commission's Draft Decision in this regard.

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 [jo.desilva@ewosa.com.au](mailto:jo.desilva@ewosa.com.au) or phone (08) 8216 1851.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jo De Silva', is positioned above the typed name and title.

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