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Retailer Energy Productivity Scheme Code

Final Decision

December 2020

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Glossary of terms

Term	Description
Commission	Essential Services Commission, established under the ESC Act
DEM	South Australian Government Department for Energy and Mining
EAT	Energy Audit Target
Electricity Act	<i>Electricity Act 1996</i>
ESC Act	<i>Essential Services Commission Act 2002</i>
Gas Act	<i>Gas Act 1997</i>
Minister	Minister for Energy and Mining
NERR	National Energy Retail Rules
REES	Retailer Energy Efficiency Scheme
REES Code	Retailer Energy Efficiency Scheme Code
Regulations	<i>Electricity (General) Regulations 2012 and Gas Regulations 2012</i>
REPS	Retailer Energy Productivity Scheme
REPS Code	Retailer Energy Productivity Scheme Code

1 Executive summary

The Retailer Energy Productivity Scheme (**REPS**) will replace the Retailer Energy Efficiency Scheme (**REES**)¹ from 1 January 2021. The South Australian Government's policy objectives for the REPS focus on improving the productivity of energy through demand shifting and response management capabilities, as well as improving energy efficiency.²

As the REPS administrator, the Essential Services Commission (**Commission**) has the functions and powers necessary to give effect to the REPS.

The Commission has made a Retailer Energy Productivity Scheme Code (**REPS Code**) that reflects the revised Government's statutory and policy framework for REPS in order to enable its effective administration from 1 January 2021. This Final Decision sets out the key differences between the Retailer Energy Efficiency Scheme Code (**REES Code**) and the REPS Code, and responses to feedback provided by stakeholders in response to the draft REPS Code that was published for consultation on 30 November 2020.

The REPS Code includes only necessary and consequential changes from the REES Code required for the Commission to administer the REPS within the revised policy framework.

The Commission will undertake a review of the REPS Code, commencing in late 2021. That review will consider the operation of the REPS under the new REPS Code, including whether there are any consumer protection or scheme administration issues that need to be addressed.

The REPS Code will come into effect on 1 January 2021, upon the revocation of the REES Code.

¹ The REES is a South Australian Government energy efficiency scheme that provides incentives for South Australian households and businesses to save energy. The REES will conclude on 31 December 2020.

² Information on the South Australian Government's policy objectives for the REPS is available at: www.energymining.sa.gov.au/energy_and_technical_regulation/energy_efficiency/retailer_energy_productivity_scheme_reps

2 Introduction

The Essential Services Commission (**Commission**), established under the *Essential Services Commission Act 2002 (ESC Act)*, is the independent economic regulator of essential services in South Australia. In undertaking its regulatory functions, the Commission's primary objective is the protection of the long-term interests of South Australian consumers with respect to the price, quality and reliability of essential services.

The Retailer Energy Productivity Scheme (**REPS**) will replace the Retailer Energy Efficiency Scheme (**REES**)³ from 1 January 2021. The Commission is the administrator of the REPS. The Government's policy intent for REPS is to support energy demand management and demand response activities, as well as energy efficiency activities in homes and businesses.⁴

To give effect to the amended scheme, Government has amended the statutory framework and, for purposes of scheme administration, the Commission has adapted the existing REES industry code to become the REPS Code, taking effect from 1 January 2021.

The REPS Code is based on the existing REES Code to provide as much consistency as possible during the transition to REPS. The Commission has made only necessary and consequential changes from the terms of the REES Code to enable the administration of the REPS within the revised policy framework.

2.1 Purpose, scope and timing of the REPS

Under the REPS, the Commission is responsible for:

- ▶ determining obliged retailers and calculating and notifying obliged retailers of any targets that apply on an annual basis
- ▶ monitoring retailer behaviour and holding them accountable for meeting their obligations, and
- ▶ annually reporting, publicly and to the Minister, on retailers' progress in achieving the required targets.

The REPS Code is required to enable the Commission to undertake these administrative functions for the REPS within the revised statutory and policy framework, and will commence from 1 January 2021.

This Final Decision outlines the key differences between the REES Code and the REPS Code.

The Commission plans to undertake a review of the new REPS Code from late 2021. That review will consider the operation of the REPS under the new REPS Code, including whether there are any consumer protection or scheme administration issues that need to be addressed.

³ The REES is a South Australian Government energy efficiency scheme that provides incentives for South Australian households and businesses to save energy. The REES will conclude on 31 December 2020.

⁴ Information on the South Australian Government's policy objectives for the REPS is available at: www.energymining.sa.gov.au/energy_and_technical_regulation/energy_efficiency/retailer_energy_productivity_scheme_reps

3 The new REPS Code

3.1 Key difference between the REES Code and the REPS Code

The REPS Code reflects the revised statutory framework. There are three key consequential differences between the REES Code and the REPS Code to enable the administration of the REPS:

- ▶ **Removal of clauses related to energy audit targets:** Under the REES, the Commission sets energy audit targets (EAT) for each primary obliged retailer by apportioning the overall annual target set by the Minister. There is no longer a requirement for the Commission to set annual EATs for obliged retailers.
- ▶ **The introduction of sub-targets:** The draft REPS Code includes the Minister's power to retain discretion to introduce sub-targets via notification in the Government Gazette.
- ▶ **New transitional arrangements:** The draft REPS Code includes updated transitional arrangements in relation to the procedures for energy credit conversion and reporting cut-off dates. The updates facilitate the administrative procedures governing the transition between the REES and the REPS.

3.2 Submissions on the draft REPS Code

On 30 November 2020, the Commission published and invited submissions on a draft REPS Code for a two-week consultation period. A stakeholder workshop was held on the planned REPS, including the draft REPS Code, on 4 December 2020.

As the draft REPS Code included only necessary and consequential changes from the REES Code required for the Commission to administer the REPS within the revised policy framework, the purpose of consultation was to inform affected parties, rather than to open issues of wider regulatory policy or scheme administration.

The Draft Decision invited feedback from stakeholders on two consultation questions:

- ▶ Does the draft REPS Code adequately capture the key changes required of the REES Code to reflect the revised policy framework developed by the South Australian Government?
- ▶ Are there any additional amendments that the Commission should consider?

Three submissions were made to the Draft Decision:

- ▶ Energy Australia⁵
- ▶ ERM Power,⁶ and
- ▶ Green Energy Trading.⁷

The submissions noted minor drafting issues and also suggested that, while not for this review, the Commission's should undertake a post-implementation review of the REPS Code review in 2021, with topics to include administrative matters such as record retention and improving compliance processes.

⁵ Energy Australia submission, available here: <https://www.escosa.sa.gov.au/projects-and-publications/projects/rees/retailer-energy-productivity-scheme-reps-2021>

⁶ ERM Power submission, available here: <https://www.escosa.sa.gov.au/projects-and-publications/projects/rees/retailer-energy-productivity-scheme-reps-2021>

⁷ Green Energy Trading submission, available here: <https://www.escosa.sa.gov.au/projects-and-publications/projects/rees/retailer-energy-productivity-scheme-reps-2021>

ERM Power also noted the tight timeframes for the transition to REPS and stated its resulting concerns in relation to compliance planning and customer communications.

The Commission thanks stakeholders for their submissions and feedback on the draft REPS Code.

All amendments are summarised in Appendix 1: Table of changes between the REES Code and the REPS Code.

3.2.1 Energy Australia

Energy Australia's submission noted that the REPS includes energy productivity activities that will not be undertaken in a premises.⁸ Accordingly, clauses in the REPS Code that limit the obligation for retailers to ensure customers have access to complaint handling procedures, and that mandatory safety and training requirements are met, to activities undertaken 'at a premises' would need to be amended to include activities not undertaken at a premises. This issue arises at several instances across the code and the Commission has therefore amended clauses 5.1.3(b)(ii), 5.1.3(d), 5.1.3(e), 7.1.3, 7.2.1, 7.4.1, 7.5.1 and 7.6 to address it. The requirement for photographic identification under clause 7.3.1 remains limited to energy productivity activities undertaken at a premises. Further details are included at Appendix 1.

Energy Australia also submitted that, depending on the Government's final decisions on the REPS, the REPS Code may need to include a household sub-target. The Commission has included the priority group household energy productivity target in the REPS Code, as this sub-target is established by the new Regulations.⁹ Under the Regulations, the Minister retains the power to set new sub-targets by notice in the South Australian Government Gazette.¹⁰ As further sub-targets have not been set at the time of making this decision, they will not be included in the REPS Code at this stage (but can be later). The Commission will notify obliged retailers of any energy productivity sub-targets they are required to achieve in accordance with the Regulations.¹¹

3.2.2 ERM Power

ERM Power noted the tight timeframe for the commencement of the REPS, stating:

*'this situation has made compliance planning and customer communications extremely difficult. Retailers rely on the ESCOSA notification of targets both to allow them to procure energy productivity activities and determine the approach to cost recovery.'*¹²

ERM Power submitted that there were risks caused by the 'rushed' implementation of the REPS, which largely stem from the lack of energy productivity targets. It stated that these risks include customer uncertainty over how their contracts will be impacted, particularly for large customers that were previously excluded from the REES.

⁸ For example, where a customer elects to connect to a time of use or prosumer tariff under a retail market offer.

⁹ Electricity (General) Regulations 2012 r25(2)(a), and Gas Regulations 2012 r19(2)(a). See: https://governmentgazette.sa.gov.au/sites/default/files/public/documents/gazette/2020/November/2020_09_2.pdf

¹⁰ Electricity (General) Regulations 2012 r25(2)(b); r25(3), and Gas Regulations 2012 r19(2)(b); r19(3). See: https://governmentgazette.sa.gov.au/sites/default/files/public/documents/gazette/2020/November/2020_09_2.pdf

¹¹ Electricity (General) Regulations 2012 r30, and Gas Regulations 2012 r24. See: https://governmentgazette.sa.gov.au/sites/default/files/public/documents/gazette/2020/November/2020_09_2.pdf

¹² ERM Power submission to REPS Draft Decision, p. 1.

ERM Power stated that, due to the delayed energy productivity targets, the current compliance plan timeframe of 31 March 2021 is not feasible. It proposed transitional arrangements be included in the REPS Code to ease the timeframe constraints by allowing retailers to have compliance plans established by 30 April 2021 and allowing retailers to commence activity fulfilment prior to compliance plans being submitted and approved.¹³ ERM Power suggested that this additional time would be used to enable negotiation of activity provider agreements once individual retailer targets are known, and effective compliance planning to take place.

The Commission acknowledges that the tight timeframes associated with the REPS implementation have led to truncated consultation opportunities and may have caused challenges with customer communication. Currently, the Commission anticipates notifying retailers of their energy productivity targets in March 2021, following the setting of overall targets by the Minister.¹⁴

The REPS Code requires that, before commencing activities in 2021, a retailer must have established and submitted a compliance plan that covers operational requirements (eg, governance, assurance, training, systems, processes and controls, and reporting). A retailer must notify the Commission of any material changes to its compliance plan (for example, the addition of new activities or providers) within 20 business days.

The Commission anticipates three months to be sufficient time for an obliged retailer who was previously participating in the REES to develop a suitable REPS compliance plan, and does not propose to change the 31 March deadline for compliance plan submission in the REPS Code. However, the Commission understands that for some retailers, particularly those who were not required to participate in the REES, developing a REPS compliance plan within the required timeframe may be more challenging. In this instance, a retailer should contact the Commission to discuss its circumstances and the possibility of an extension beyond the 31 March 2021 deadline.

3.2.3 Green Energy Trading

Green Energy Trading's submission to the Draft Decision identified two clause referencing issues in the draft REPS Code. These errors have been corrected in the final REPS Code.

Green Energy Trading also provided feedback for consideration in a post-implementation review, relating to record retention and improving compliance processes.

¹³ ERM Power submission to REPS Draft Decision, 10 December 2020, p. 2.

¹⁴ The target setting process includes data verification and data quality checks of the data received from retailers against that received from other entities. This often requires subsequent follow-up with retailers. Considering this, and as the target setting process requires proportional allocation of targets, the Commission does not anticipate finalised 2021 targets to be available before March 2021.

4 Next steps

The REPS Code will come into effect on 1 January 2021 on the commencement of the REPS.

The Commission welcomes ongoing discussions with stakeholders on any of the matters raised in this Final Decision or on any related matters.

The Commission plans to undertake a post-implementation review of the new REPS Code, commencing in late 2021. That review will consider the operation of the REPS during the scheme's first six months, including whether there are any consumer protection or scheme administration issues that need to be addressed, along with stakeholder submissions that could not be addressed in this process.

5 Appendices

Appendix 1: Table of changes between the REES Code and the REPS Code

Appendix 1: Table of changes between the REES Code and REPS Code

Number	Existing term or clause/s in REES Code	New term or clause in REPS Code	Reason for change	Relevant regulation
Global changes				
1	REES	REPS	Reflects the new scheme name.	N/A
2	'Energy efficiency' or 'energy reduction'	Energy productivity	The REPS objective is to improve energy productivity.	N/A
3	'Energy audit'	None	There are no energy audits under the REPS. All clauses relating to energy audits, and references to energy audits, have been removed.	N/A
Definitions				
4	None – new term.	energy productivity sub-target means a target set by the Minister which is a designated proportion of an energy productivity target that must be met in a specified manner, including, but not limited to, the priority group household energy productivity target .	Under the REPS the Minister will have discretion to establish new energy productivity sub-targets by publishing notice in the Gazette.	<i>Electricity (General) Regulations 2012, r25.</i> <i>Gas Regulations 2012, r19.</i>
5	None – new term.	normalised gigajoules are calculated pursuant to a notice published by the Minister under the Part 4 of the <i>Electricity (General) Regulations 2012</i> and Part 4 of the <i>Gas Regulations 2012</i> that sets out relevant information relating to an activity or measure that constitutes an energy productivity activity .	Transitional arrangements in chapter 8 of the REPS Code require credits and shortfalls accrued by obliged retailers prior to 1 January 2021 to be expressed in normalised gigajoules rather than tonnes of carbon dioxide equivalent.	<i>Electricity (General) Regulations 2012, r28(4)</i> <i>Gas Regulations 2012, r22(4).</i>

Number	Existing term or clause/s in REES Code	New term or clause in REPS Code	Reason for change	Relevant regulation
6	primary obliged retailer refers to an energy retailer which has residential customer numbers equalling or exceeding the primary obligation threshold as at 30 June immediately prior to the commencement of a REES year . A primary obliged retailer will be set an energy reduction target , a priority group energy reduction target , an energy audit target .	primary obliged retailer refers to an energy retailer which has residential customer numbers equalling or exceeding the primary obligation threshold as at 30 June immediately prior to the commencement of a REPS year . A primary obliged retailer will be set an energy productivity target , and a priority group household energy productivity target , and may be set further energy productivity sub-targets .	Definition changed to reflect revised obligations on primary obliged retailers. Under the REPS primary obliged retailers will be set an energy productivity target and an energy productivity sub-target, the priority group household energy productivity sub-target.	<i>Electricity (General) Regulations 2012</i> , r25. <i>Gas Regulations 2012</i> , r19.
7	priority group energy reduction target means a target as determined under Part 4 of the <i>Electricity (General) Regulation 2012</i> and Part 4 of the <i>Gas Regulations 2012</i> (as the case may be).	priority group household energy productivity target is an energy productivity sub-target set by the Minister from time to time under Part 4 of the <i>Electricity (General) Regulation 2012</i> and Part 4 of the <i>Gas Regulations 2012</i> which must be met in the specified manner.	Definition changed to reflect the revised energy productivity sub-target obligation, the priority group household energy productivity sub-target, under the REPS.	<i>Electricity (General) Regulations 2012</i> , r25(2)(a). <i>Gas Regulations 2012</i> , r19(2)(a).
8	None – new term.	REPS year means each consecutive twelve-month period 1 January to 31 December, commencing on 1 January 2021.	New definition to reflect new scheme.	N/A.
Chapter 1 Preliminary				
9	None.	Clause 1.4.3 Nothing in this Code affects anything done or omitted to be done or rights, obligations or liabilities accrued under the previous Retailer Energy Efficiency Scheme Code (REESC) in effect from time to time.	A new clause 1.4.3 has been drafted to make clear that liability for breaches committed before the end of the REES Code remain despite the creation of the new REPS Code.	N/A.
10	Clause 1.6 Retailers' general obligations	Re-drafted to reflect revised retailer obligations under the REPS.	This clause has been redrafted to clearly state retailers' revised general obligations under the REPS. The redrafted clause includes the new obligation on obliged	<i>Electricity (General) Regulations 2012</i> , r22. <i>Gas Regulations 2012</i> , r16.

Number	Existing term or clause/s in REES Code	New term or clause in REPS Code	Reason for change	Relevant regulation
			retailers to meet any energy productivity sub-targets set by the Minister.	
11	Clause 1.7 Class of persons experiencing hardship	Not included in the REPS Code.	The Regulations no longer give the Commission power to define classes of person experiencing hardship.	<i>Electricity (General) Regulations 2012, r23(1).</i> <i>Gas Regulations 2012, r17(1).</i>
Chapter 2 Determination of Obligated Retailers				
12	Clause 2.1 Obligation thresholds	Updated to reflect the REPS energy productivity sub-targets, and to include the possibility of secondary obligated retailers being subject to energy productivity sub-targets.	Amended to reflect that under REPS a primary obligated retailer will be subject to a priority group household energy productivity target, and may be set further energy productivity sub-targets. Additionally, a secondary obligated retailer will be set an energy productivity target and may be set energy productivity sub-targets.	<i>Electricity (General) Regulations 2012, r22.</i> <i>Gas Regulations 2012, r16.</i>
Chapter 3 Energy Audits				
13	Chapter 3 Energy audits	Deleted - no references to energy audits are included in the REPS Code.	Energy audits will not be a part of the REPS.	N/A.
Chapter 4 Annual Energy Reduction Target				
14	Clause 4.3.2 Obligation to achieve productivity targets	Clause 4.3.2 and all its sub-paragraphs have not been included in the REPS Code.	This clause is inconsistent with the new Regulations which provide that the Minister by Gazette notice has the power to determine what constitutes energy productivity activities.	<i>Electricity (General) Regulations 2012, rr26, 27, 28.</i> <i>Gas Regulations 2012, rr20, 21, 22.</i>

Number	Existing term or clause/s in REES Code	New term or clause in REPS Code	Reason for change	Relevant regulation
15	Clauses 4.4.2, 4.4.3 and 4.4.4 Notification of energy reduction target shortfall	Clauses not included in the REPS Code.	This clause has not been included in the REPS Code as it duplicates requirements contained in the Regulations.	<i>Electricity (General) Regulations 2012</i> , rr26, 27. <i>Gas Regulations 2012</i> , rr21, 22.
Chapter 5 Record Keeping, Reporting and Assurance				
16	Clause 5.1 Compliance plans	<p>Clause 5.1.3(b)(i)</p> <p>Amended to reflect updated complaint and dispute resolution standard.</p> <p>Clause 5.1.3(b)(ii)</p> <p>Amended to remove limitation to making complaint and resolution procedures readily accessible. The words <i>'in their premises'</i> has been removed.</p> <p>Clause 5.1.3(d)</p> <p>Amended to remove limitation to require persons undertaking energy productivity activities to have fulfilled the relevant mandatory training requirements. The words <i>'in a customer's premises'</i> have been removed.</p> <p>Clause 5.1.3(e)</p> <p>Amended to remove limitation to require systems and processes to address only energy productivity activities undertaken in a premises. The words <i>'in a customer's premises'</i> have been removed.</p>	<p>The required complaint and dispute resolution standard Australian Standard ISO 10002-2006 has been updated since the previous Code review. The relevant standard that now applies is AU/NZ 10002:2014, and any successor standard that subsequently supersedes this standard.</p> <p>Under the REPS, energy productivity activities may be undertaken outside of a premises. Accordingly, the REPS Code requires obliged retailers to provide access to the requisite complaint handling procedures, and to have undertaken all relevant mandatory training, regardless of where the energy productivity activity was undertaken.</p>	N/A.

Number	Existing term or clause/s in REES Code	New term or clause in REPS Code	Reason for change	Relevant regulation
17	Clause 5.4 Reporting obligations	Clause 5.4.2 Amended to reflect the updated Energy Industry Guideline number.	'Energy Industry Guideline No. 6 – Retailer Energy Efficiency Scheme Guideline – Statistical Information' will be updated to reflect new requirements for the REPS, and will be called 'Energy Industry Guideline No. 7 – Retailer Energy Productivity Scheme Guideline – Statistical Information'.	N/A
Chapter 7 Consumer Protection Obligations				
18	Clause 7.1 Information provision	Amended to remove the limitation that an obliged retailer must only provide customers with a written information statement where an energy productivity activity was <i>undertaken at a premises</i> .	Under the REPS, energy productivity activities may be undertaken outside of a premises. Accordingly, the REPS Code requires obliged retailers to provide a written information statement to a customer regardless of where the energy productivity activity was undertaken.	N/A
19	Clause 7.2 Complaints	Amended to reflect updated complaint and dispute resolution standard. Amended to remove the limitation that an obliged retailer must only ensure customers have access to the requisite complaint handling procedures where an energy productivity activity was <i>undertaken at a premises</i> .	The required complaint and dispute resolution standard Australian Standard ISO 10002-2006 has been updated since the previous Code review. The relevant standard that now applies is AU/NZ 10002:2014, and any successor standard that subsequently supersedes this standard. Under the REPS, energy productivity activities may be undertaken outside of a premises. Accordingly, the REPS Code requires obliged retailers to provide access to the requisite complaint handling procedures regardless of where the energy productivity activity was undertaken.	N/A.

Number	Existing term or clause/s in REES Code	New term or clause in REPS Code	Reason for change	Relevant regulation
20	Clause 7.4 General conduct standards	Amended to remove the limitation that general conduct standards only apply to persons conducting energy productivity activities on that retailers behalf <i>at a premises</i> .	Under the REPS, energy productivity activities may be undertaken outside of a premises. Accordingly, ' <i>at a premises</i> ' has been removed from the clause to require obliged retailers to ensure all persons undertaking energy productivity activities adhere to general standards of conduct, regardless of where those activities are undertaken.	N/A
21	Clause 7.5 Mandatory safety requirements	Amended to remove the limitation that retailers ensure all persons conducting energy productivity activities on that retailers behalf <i>at a premises</i> have undertaken all necessary training (including, without limitation, health, safety and welfare training) to provide those energy productivity activities.	Under the REPS, energy productivity activities may be undertaken outside of a premises. Accordingly, ' <i>at a premises</i> ' has been removed from the clause to require obliged retailers to ensure all persons undertaking energy productivity activities have undertaken all necessary training, regardless of where those activities are undertaken.	N/A.
22	Clause 7.6 Fit and proper person test	Amended to remove the limitation that retailers ensure all persons conducting energy productivity activities on that retailers behalf <i>at a premises</i> are fit and proper persons.	Under the REPS, energy productivity activities may be undertaken outside of a premises. Accordingly, ' <i>at a premises</i> ' has been removed from the clause to require obliged retailers to ensure all persons undertaking energy productivity activities are fit and proper persons, regardless of where those activities are undertaken.	N/A
Chapter 8 – Transitional Arrangements				
23	Clause 8.1 Conversion of energy credits and shortfalls	Clause 8.1.1 has not been included in the REPS Code.	Clause 8.1.1 is inconsistent with the process for applying unused credit contained in the new Regulations. The new Regulations allow a maximum amount	<i>Electricity (General) Regulations 2012, Part 4, Schedule 1, r2.</i>

Number	Existing term or clause/s in REES Code	New term or clause in REPS Code	Reason for change	Relevant regulation
		Clause 8.1.3 has not been included in the REPS Code.	<p>equivalent to 20% of the energy efficiency target applying to the retailer for 2020 to be applied in 2021 as energy credit.</p> <p>Clause 8.1.3 is now obsolete. All credits and shortfalls are already calculated in normalised gigajoules and no conversion needs to take place.</p>	<i>Gas Regulations 2012</i> , Part 4, Schedule 1, r2.
24	Clause 8.3 2014 reporting provisions	Clause 8.3 has not been included in the REPS Code	Clause 8.3 is now obsolete as it refers to 2014 reporting provisions that are no longer relevant.	N/A.



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