



ENERGY & WATER
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Ms Amber Miller
Acting Director, Consumer Protection and Pricing
Essential Services Commission of South Australia
GPO Box 2605
Adelaide SA 5001

19 March 2021

Dear Ms Miller,

**Submission to the Essential Services Commission of South Australia (ESCOSA):
SA Water Regulatory Determination 2024 Framework and Approach Paper**

The Energy and Water Ombudsman (SA) Limited (“EWOSA”) welcomes the opportunity to submit on the Essential Services Commission of South Australia’s Framework and Approach Paper on the *SA Water Regulatory Determination 2024* (“SAWRD24”).

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.

SA Water is a Member of EWOSA and we receive complaints from SA Water’s customers about aspects of SA Water’s service and performance. We have attached a copy of the number and types of cases received by EWOSA relating to SA Water since FY2018.

We also attach a comparator chart of our larger Members and their relative complaints levels.

In terms of the Framework and Approach, we support ESCOSA providing for customer challenge and regulator input into the decision through the proposed formal structures. We also support early engagement by SA Water on its Regulatory Business Proposal.

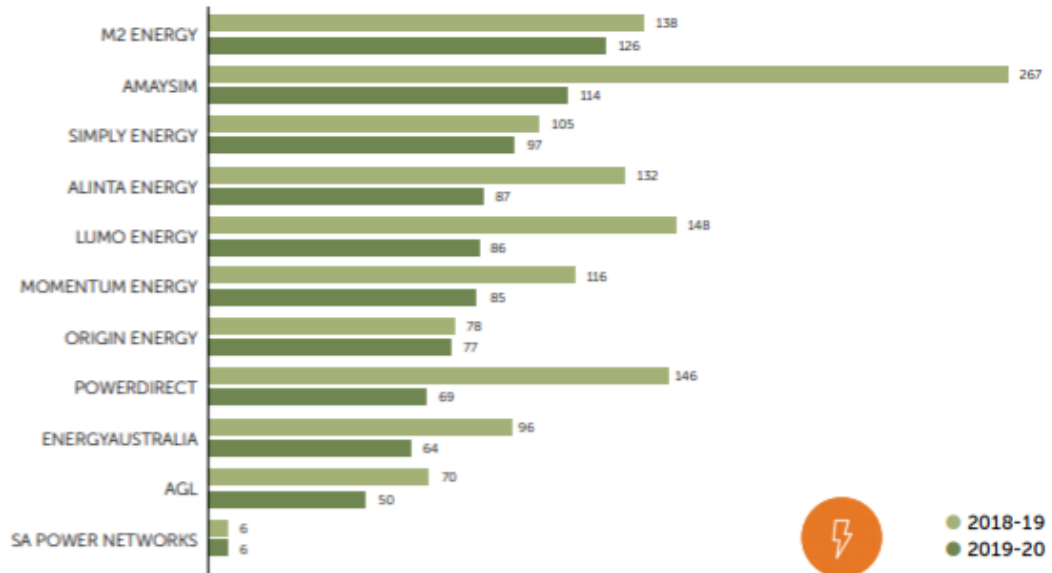
Should you require further information or have any enquiries in relation to this submission, please contact me at jo.desilva@ewosa.com.au or on (08) 8216 1851.

Yours sincerely

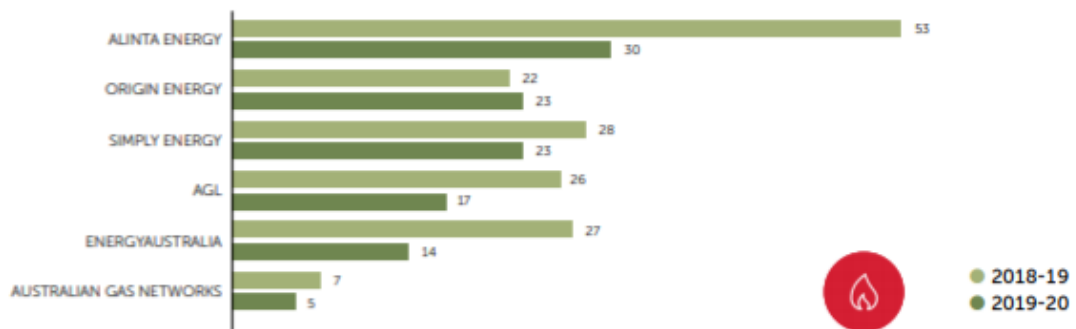
A handwritten signature in blue ink, appearing to read 'Jo De Silva'.

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

Cases received by Members and per 10,000 customers



ELECTRICITY: CASES RECEIVED, PER 10,000 CUSTOMERS



GAS: CASES RECEIVED, PER 10,000 CUSTOMERS



WATER: CASES RECEIVED, PER 10,000 CUSTOMERS

SA Water Cases Received to 14/3/21 by Primary Issue			Received Date			
Tier 1 Issue	Tier 2 Issue	Tier 3	FY 2018	FY 2019	FY 2020	FY 2021
Billing	Account	Account Details	4	5	12	9
		Other Error	5	2	1	1
		Statements	24	13	10	1
	Backbill	Backbill Historical Mapping	6	3		
		Denies Responsibility	3	5	6	1
		Disputed Billing Period	12	2	3	5
		Disputes Usage	2	3		3
	Billing Process	Concession Rebate Error	4	3	2	
		Cross Metering Wrong Meter	5	1	2	2
		Delayed Bill	4	2	1	1
		Doesnt Understand Bill		1	1	1
		Inaccurate Estimate	10	6	2	2
		Incorrect bill following fix of fault	1	6		2
		No Bill Received	2	4	1	3
	Fees and Charges	Late Payment fees	1		1	
		Other Fees	11	19	6	6
		Reconnection Fee			1	1
		Supply Charge	9	15	26	13
	High	Unexplained Usage	120	119	106	49
	Payment	Lost Payment	7	7	2	9
		Payment Historical Mapping	4	7		
		Payment Methods	3	2	7	1
		Payment Plan Admin Issues	1	1	3	2
Refunds		3	3	5	1	

	Tariff billing	Incorrect Tariff	2	1		
		Information / Conditions	2	3		
Credit Management	Credit Action Disputed Liability	Credit Liability Historical Mapping	5	2		
		Current Address	3	7	7	7
		Deceased Estate		1		1
		Previous Address	2		1	
	Credit Action Taken In Error	Default Listed In Error	3			
		Referred To Collection Agency In Error			2	1
	Disconnection (incl imminent)	Actual Disconnection	2		2	
		Imminent Disconnection	1		1	
	Financial Hardship	Cannot_Afford_New_or_Renewed_Payment_Plan			1	
		Difficulty Meeting Payment Plan	3	3	7	
Member Refused Payment Plan		2	1	2		
Unable to Pay		3	3	2	4	
Customer Service	Privacy	Company's Privacy Policy	1			
		Details Released			1	
		Other Privacy Issue			1	
	Staff Behaviour	Concern not escalated				1
		FailureDelay in Response	3	2	1	4
		Information Incorrect Not Provided	4	3	1	1
		Poor Behaviour By Individual		1		
Staff Behaviour Historical Mapping	6	5				
General Enquiry	Information general	Compliment to EWOSA Staff			2	1
		Contacted EWOSA In Error	10	14	27	4
		Information Provided	10	14	13	14
		Insufficient_Information_to_Progress Case		1	4	3
		Ombudsman	2	3	2	
		Regulatory or Industry Info	6	9	5	3
	Out of Jurisdiction	Capital Contribution Enquiry		2		4

		Electrician or Gas Fitters			1	
		Government Agency	11	7	2	3
		Legal Advice or Civil Dispute	11	10	9	2
		Non Energy or Water	3			
		Other Ombudsman	1	1		
		Other OOJ	1	4	2	2
		Pricing Enquiry		7	2	1
Land	Damage Land	Delay in Repair	1	4	5	5
		Property	10	8	2	9
		Reimbursement Claim		3	10	5
	Land Other	Easement Issues	3		1	1
		Meter Placement Access	1	2		1
		Tree trimming/clearing				1
	Network Infrastructure	Cost of Infrastructure	1	4	6	3
		Maintenance	6	7	6	4
		Placement of Infrastructure	1	1	6	2
		Safety of Infrastructure	1	1		
Visual Noise Pollution				1		
Provision	Connection	Delay in Connection	4	3	1	
		Other Connection Issue		1	1	2
	Disconnection	Delay in Disconnection	2		1	1
		Disconnection Error			1	
		Supply / defect	1	1		2
	Meter Installation or Abolishment	Delay In Abolishment	1			1
		Faulty Meter Replacement Delay		1	3	5
		New Connection Delay	3	2	2	
		Other Metering Installation Complaints	8	5	6	2
		Solar Meter Upgrade Delay	1	1		
	Meter Tests and Reads	Delay In Meter Test			1	

		Inaccurate Read	12	1		
		Meter Tests And Reads Historical Mapping	4	3		
		No Or Delayed Meter Read	2	4	1	2
Sales and Marketing	Contract	Tariff				1
	Market Conduct	Coercion or Pressure Sale				1
		Market conduct historical mapping		1		
Supply Quality	Outages	Duration of Unplanned Outage	12	10		3
		DurationFrequency of Planned Outage	2			
		Frequency of Unplanned Outage		1	2	
		GSL Rebate	1			
		Notice Of Planned Outage			1	
	Variation in Supply Leakages	Sewer Blockage Or Overflow	12	13	6	7
		Water Leakages		6	28	10
		Water Use Restriction	3	1	4	
	Water Quality	Odour Colour Taste	2	8		
		Water Leakage	4	11		
Water Pressure		5	5	9	3	
Grand Total			441	441	400	240

**Please note that FY 2021 is up to and including 14/3/21.