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Essential Services Commission
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Retailer Energy Productivity Scheme (REPS) Code Review 2021

Ecovantage welcomes the opportunity to comment on the Retailer Energy Productivity Scheme Code Review.

In general, Ecovantage supports the proposed amendments to improve the customer protection and experience under the REPS program, however we firmly believe that the proposed change that relates to the line of sight between obligated retailers and customers would become a barrier in regard to the delivery of the activities under the REPS program. This would in turn impact achieving REPS targets for our Retailer Partners. More details are discussed in the response to the consultation questions later in our response.

About Ecovantage

Ecovantage was established in 2007 to support businesses and households to reduce energy use and contribute to the fight against climate change through a reduction in emissions. We work within the energy efficiency schemes in New South Wales, Victoria, South Australia and Queensland as well as the national Renewable Energy Target scheme to help businesses and households access incentives for energy efficiency upgrades.

With dedicated teams who are trained and experienced in their roles we offer turnkey solutions for our clients that include: Solar & Batteries, Energy Brokering, Tariff optimisation, Hot water upgrades, LED Lighting upgrades, Street lighting installation, Power factor correction. We believe that the Evaporative Cooler Activity will be yet another of the solutions that will be considered for our clients.

Responses to consultation questions

- 1. Do stakeholders support amending the existing requirement to provide an information statement to include the requirement to provide the name of the obliged retailer on whose behalf the activity is undertaken prior to commencement of the REPS activity (refer clause 6.1.2(b) of the draft REPS Code at Appendix 2)?**

Answer: Ecovantage believes that this requirement will become a barrier to the successful delivery of the REPS targets set by ESCOSA and the Energy Retailers. The rollout of activities and ultimately the generation of certificates under the REPS program will be hindered by introducing this extra step in the customer engagement process.

As noted in the consultation paper most activity providers may have contracts with multiple Energy Retailers and therefore it will be very difficult to maintain the certificate delivery requirements imposed by such Retailers. Currently the delivery and submission expectations and arrangements vary between Retailers which can impact how Ecovantage engages with the customer. If this proposed change is introduced, then it will make it very difficult to maintain the existing service level agreements with the Retailers. This will in turn create lag in regard to submission timing and may cause delays in achieving monthly, quarterly and annual targets.

Ecovantage has refined a process over the years that has created a great working relationship with our Retailer Partners as well as with our customers and we are confident that our proposal below will provide additional assurance to the department regarding the management of any customer complaints and issues.

Ecovantage suggests the implementation of a code of conduct for all Activity Providers under the REPS code which outlines their obligations to ensure that customers are protected, and adequate measures are in place in terms of the dispute resolution process for pre submission situations. This in addition to current REPS code requirements regarding customer complaints and resolutions post submission.

This code of conduct would detail how all Activity Providers would need to behave regarding pre-engagement with customers, as well as during the sale and installation process. In addition, further requirements regarding disclosure of issues raised at the point of sale and or installation can be included to ensure that all Activity Providers share with their relevant Retailer Partners all complaints raised and resolved prior to submissions. This will then enable the Energy Retailers to assess the Activity Providers' response and resolution process prior to accepting said submission. In addition, the code would also reference and expect that all complaints raised at pre submission be flagged in ESCOSA's system so this can be easily tracked. This process can also be replicated for any complaints post submission. Finally, in addition to the above-mentioned approach, Ecovantage also recommends that under this code, all complaints received directly from the customer to ESCOSA be referred back to the Activity Provider in the first instance (via the customer's activity record) so that the first point of contact for ESCOSA to address any customer complaints are with the Activity Provider in the first instance and then the Energy Retailer, (once the Activity Provider shares the submission details).

- 2. Do stakeholders support the introduction of minimum standards which must be applied by obliged retailers when conducting fit and proper person assessments (refer clause 6.6.2 of the draft REPS Code at Appendix 2)?**

Answer: Ecovantage supports the introduction of the min standard for persons undertaking the activity, this will mitigate the risk of harm to members of the public as well as protect the reputation of the REPS program.

- 3. Do stakeholders support the clarification of record keeping requirements, such that obliged retailers must retain actual possession of all activity records for a period of five years following the completion of the activity (refer clause 4.3 of the draft REPS Code at Appendix 2)**

Answer: Yes, Ecovantage supports the proposed changes to the record keeping requirements

- 4. Do stakeholders support the proposal to require the provision of information to customers at the commencement of the REPS activity (rather than at the time it is performed)?**

Answer: Ecovantage supports the proposed changes. This will also bring REPS in line with similar measures implemented by other schemes in order to strengthen consumer protections.

- 5. Do stakeholders support the proposal that:**

- the existence and amount of any co-payment must be clearly communicated to the customer at the time of booking a REPS activity, and**
- the existence and amount of any co-payment must be clearly set out on the information statement?**

Answer: Ecovantage supports providing more transparency to the customer in terms of the co-payment (whether it is the minimum requirement or additional to that minimum co-payment amount) at the time of booking through the Activity Provider's proposal, as well as ensuring that on the information statement, the customer clearly understands the REPS code minimum contribution requirements.

- 6. Do stakeholders support the administrative amendments proposed to the Code?**

Answer: Ecovantage supports the administrative amendments to the code.

Bruce Easton
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