



8 December 2021

Essential Services Commission of South Australia

Submitted by email: escosa@escosa.sa.gov.au

Dear Sir/Madam,

Retailer Energy Productivity Scheme (REPS) Code Review – Draft Decision

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Retailer Energy Productivity Scheme Code Review draft decision.

Origin has been a major liable party under the REES/REPS since the scheme commenced. We welcome the clarifications and improvements provided in this review of the REPS Code.

As a general comment, we highlight that additional regulation can force increased costs in the scheme, which will be passed onto customers. Therefore, we encourage clear and efficient REPS code requirements that balance improvements to the scheme administration with any extra cost they may impose.

We provide the following comments on the REPS Code draft decision.

Consultation question 1

Origin does not support an arrangement whereby sub-contractors can offer an activity without appropriate dispute resolution procedures. We welcome appropriate change to stop this occurring.

Origin does not believe that adding the Retailers name to the information statement will prevent problems occurring. Our proposed alternative to this rule is to only allow sub-contractors to work directly for the approved provider and for no further sub-contracting to occur. In this way reporting mechanisms can extend directly back to the retailer. Further, if sub-contractors were only allowed to contract to a single approved provider this would strengthen a single link to a retailer.

Consultation question 2

No comment.

Consultation question 3

Origin supports the keeping of Activity Records and the adjusted time frame.

Consultation question 4

Origin supports the change to provide the customer an information statement prior to the commencement of the activity.

Consultation question 5

Origin supports the proposal that any co-payment must be clearly communicated to a customer in the information statement. We recommend that a general statement about a minimum co-payment is relevant to the information statement, rather than an exact amount. Including specific pricing information in the information statement if offered at initial contact is at too early a stage to be useful.

Consultation question 6

Origin provides the following commentary on the other administrative amendments to the Code:

- What time commitments do retailers have for notifications regarding target and retailer determinations?

We ask that ESCOSA suggests language in the code to give Retailers a concrete time frame to receive the following years target determination (31 September is a suitable timeframe now given all data is sourced through AEMO, AGN and SAPN).

If you wish to discuss any aspect of this submission further, please contact Matthew Kaspura at matthew.kaspura@originenergy.com.au or on 02 9503 5178.

Yours sincerely,



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