



ENERGY & WATER  
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Ms Amber Miller  
Manager, Regulatory Policy  
Essential Services Commission of South Australia  
GPO Box 2605  
Adelaide SA 5001

17 March 2022

Dear Ms Miller,

**Submission to the Essential Services Commission of South Australia (ESCOSA) Off-Grid Energy Consumer Protection Framework Review (Off-Grid Review).**

The Energy and Water Ombudsman (SA) Limited (Energy & Water Ombudsman SA) welcomes the opportunity to submit on the Essential Services Commission of South Australia's Off-Grid Review

Energy & Water Ombudsman SA 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.

Some off-grid suppliers are Members of EWOSA and we receive complaints from their customers about aspects of their service and performance. We have attached details of these cases to this submission.

In terms of the Off-Grid Review consultation questions, where practical, we support the changes that are proposed so that consumers of off-grid gas and electricity have a more consistent set of core protections across the two fuel types.

In terms of hardship and disconnections, we acknowledge there is already alignment between the NECF provisions and those of the Commission. Given there is already some alignment, any additional protections should be considered in light of the costs to the small providers and the additional benefits it offers the customer. We believe the focus should appropriately be on protecting vulnerable customers.

In relation to when disconnection may be prevented, we support the broader NERL provision given the last resort nature of disconnection and that customer engagement with their retailer is to be supported in this context.

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

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Jo Desilva', written in a cursive style.

Policy and Communications Lead

EWOSA cases related to off-grid supply

Prepared 17 March 2022

Registered date	Case type	Issues
16 Sep 2021	Enquiry	Provision – Existing Connection – Other Metering Installation Complaints
9 Nov 2020 11 Dec 2020 4 Jan 2021	Refer to higher level	Billing – Payment - Refunds
26 Jun 2019	Facilitation	Provision – Existing Connection – Faulty Meter Replacement Delay
20 Dec 2021	Refer back to Scheme Member	Supply – Off Supply – Unplanned – Duration of Unplanned Interruption Supply – Water Quality – Odour/Colour/Taste
14 Feb 2022	OOJ	Land – Property Damage – Property Customer Service – Incorrect Advice/Information – Incorrect Advice/Information
17 Feb 2022	OOJ	General Enquiry – OOJ – Government Agency
28 Sep 2021	Enquiry	Supply – Off Supply – Unplanned – Duration of Unplanned Interruption General Enquiry – Information General – Contacted EWOSA in Error
3 Jul 2017	Refer to higher level	Credit – Payment Difficulties – Difficulty Meeting Payment Plan
9 Jul 2018	Enquiry	Billing – Billing Process – Delayed Bill

15 May 2017	Refer to higher level	Credit – Credit Action – taken in error – Default listed in error
2 May 2019	Refer to higher level	Provision – Existing Connection - Abolishment
29 May 2019	OOJ	Provision – Existing Connection - Abolishment
7 Feb 2022	Refer to higher level	Billing – High - Disputed