

2 June 2022

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Senior Policy Officer
Essential Services Commission of South Australia
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DRAFT DECISION COWELL ELECTRIC SUPPLY PTY LTD LICECNE AMENDMENT: PROPOSED PREPAYMENT BY DEFAULT CONSUMER PROTECTIONS

Dear Tamsyn

We would like to thank you for the opportunity to provide input into the draft decision for proposed licence amendment. We offer the following feedback.

Discussion Paper

Opt-in weekend disconnection – We do not support this option and request its removal. This will require two different sets of pre-payment customer within our software and generate excessive administration. Given the low tariff we do not anticipate high debt during friendly credit times.

We support a **maximum** of 30% top up however this will be negotiated with the customer dependent on their ability to repay. Our calculations show that 30% would provide customers with greater flexibility and allow them to pay down a weekends debt within a fortnight rather than it taking around a month.

2.4 We do not believe it is the intention of the variation to allow fees and charges associated with the sale of electricity, such as meter replacement or testing charges, to only be charged through the prepayment meter. The customer must have the option whether they want these fees added to their meter debt or whether they want to pay fees other than for electricity consumption in full using other payment options.

Table of concerns

Reporting – As discussed, the proposed reporting metrics require more detail to narrow down criteria.

We seek clarification regarding reporting of payment splitting, we can report number of customers on payment splitting arrangements at the end of each quarter for the quarterly reports and as at 30/6 for the annual report.

The reason for self-disconnection (3x3x240) - we will provide this information where we are able to contact the customer however there may be instances where the customers cannot be contacted which we believe is covered by 2.8.1 (a).

We propose reporting requirements for number of times friendly credit and emergency credit accessed be as at the last day of each quarter and 30/6.

We propose average duration of self-disconnection requires parameters as self-disconnects may only be for a matter of seconds or minutes.

Licence










1.3.2 – states that a reference to writing includes electronic mail. We anticipate difficulty in the customer accessing technology to download, print, sign, scan and return various forms and propose the implementation of verbal consent with customers. A script and written record of the details of the conversation with the customer would be kept.
















1.10 Life Support systems – We request the addition of a timeframe for receipt of appropriate medical confirmation that a person residing at the supply address requires a life support system, in order to prevent an indefinite pending status and issues associated with deregistration and cessation of requirement in accordance with 1.11.2.

2.3.1 (c) - Below are screenshots of information available from the meter.

Key 1: Current Day and Previous Day Cost of Consumption

A short press of key '1' will initiate the associated display sequence. After each set of information comprising a title followed by its data, either a four (4) seconds wait or short press of the key will advance the display to the next set of information as described below.

<p>Title 1: Current day's cost</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>  <p>(timeout 4 secs)</p>  <p>Press key 1 to advance to the next display</p>	<p>The 1st set of displays associated with key 1 indicating the cost of electricity used today since midnight (00:00 GMT).</p> <p>The example shows that \$4.12 is the current cost of electricity used.</p>
<p>Title 2: Previous day's cost</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>  <p>(timeout 4 secs)</p>  <p>Press key 1 to advance to the next display</p>	<p>The 2nd set of displays indicating the cost of electricity used yesterday.</p> <p>The example shows that \$11.78 was the cost of electricity used.</p>
<p>Title 3: Current day usage</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>  <p>(timeout 4 secs)</p>  <p>Press key 1 to advance to the next display</p>	<p>The 3rd set of displays indicating electricity consumption today since midnight.</p> <p>The example shows that 8.5 kWh has been used.</p>

<p>Title 4: Previous day usage</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>  <p>(timeout 4 secs)</p>  <p>Press key 1 to return to the 1st display.</p>	<p>The 4th set of displays indicating yesterday's electricity consumption.</p> <p>The example shows that 15.6 kWh was used.</p>
<p>Title 5: Current week's cost</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>  <p>(timeout 4 secs)</p>  <p>Press key 1 to advance to the next display</p>	<p>The 5th set of displays associated indicating the cost of electricity used in the current week.</p> <p>The example shows that \$11.78 is the cost of electricity consumed in current week.</p>
<p>Title 6: Previous week's cost</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>  <p>(timeout 4 secs)</p>	<p>The 6th set of displays indicating the cost of electricity used in the previous week.</p> <p>The example shows that \$11.78 was the cost of electricity consumed in previous week.</p>
<p>Title 7: Current month's cost</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>	<p>The 7th set of displays associated with key 3 indicating the cost of electricity used since the 1st of the current month.</p> <p>The example shows that \$11.78 is the cost of electricity consumed since 1st of the current month.</p>
 <p>(timeout 4 secs)</p>  <p>Press key 1 to advance to the next display</p>	
<p>Title 8: Previous month's cost</p>  <p>(timeout 2 secs)</p> <p>Followed by value</p>  <p>(timeout 4 secs)</p>  <p>Press key 1 to return to the 1st display.</p>  <p>Press key B to scroll back up the display list.</p> <p>No key press at the end of this display sequence will cause the auto-cycle display to resume.</p>	<p>The 8th set of displays indicating the cost of electricity used in the previous month.</p> <p>The example shows that \$11.78 was the cost of electricity consumed in previous month.</p>

2.4.3 and 2.4.4 Opt-in and opt-out – as above, we do not support this.

2.9 Cash at a minimum of two locations is impossible – this needs to be changed to reflect the fact that these communities only have one store and the wording “at least one of the following methods” means that the payment portal covers us off on the entire clause.

2.14.2 (d) – Request the word “must” be changed to “may” to remain consistent with

2.15.1. As previously commented above, the customer should have the option whether they want these fees added to their meter debt or whether they want to pay the fees in full using other payment options.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ann-Marie Wiseman', written in a cursive style.

Ann-Marie Wiseman

ELECTRICITY DISTRIBUTION & RETAIL COORDINATOR