

Review of the Retailer Feed-in Tariff - Draft Price
Determination
Essential Services Commission of South Australia
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Submitted by email to escosa@escosa.sa.gov.au

30th October 2013

Dear Commissioners,

RE: ESCOSA's Review of the Retailer Feed-in Tariff - Draft Price Determination¹

Thank you for the opportunity to comment on the Draft Price Determination.

As the peak body for the community services sector in South Australia, SACOSS has a long-standing interest in the delivery of essential services and particular the cost of basic necessities like electricity because they impact greatly and disproportionately on vulnerable disadvantaged people.

As previously stated in our submission regarding the Review of The Solar Feed-in Tariff Premium - Issues Paper, SACOSS is not convinced that a case currently exists to deregulate the retailer component of the feed-in tariff (FiT). SACOSS is of the view that a more sophisticated market involving interval meters, time-based tariffs and, possibly, the ability to sell via an aggregator other than your retailer is required before deregulation should be considered².

With this in mind SACOSS supports the Commissions' draft determination to continue regulation of the retailer FiT. SACOSS also supports the introduction of a price monitoring regime that aims to measure competition efficacy and provide evidence for the Commission's future decisions regarding deregulation. We encourage the Commission to include a focus on the competitiveness of the total offers being made to solar customers, not just the retailer component of the FiT.

We thank you in advance for your consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on 8305 4211 or via jo@sacoss.org.au.

Yours sincerely,



Ross Womersley
Executive Director

¹ <http://www.escosa.sa.gov.au/projects/200/review-of-the-solar-feed-in-tariff-premium.aspx>

² <http://www.escosa.sa.gov.au/library/130807-ReviewofSolarFeedinPremiumIssuesPaperSubmission-SACOSS.pdf>