



ENERGY & WATER
OMBUDSMAN SA

GPO Box 2947
Adelaide SA 5001

T 1800 665 565
F 1800 665 165

ABN 11 089 791 604

ewosa.com.au

Mr Rod Sims
Chairman
Australian Competition and Consumer Commission
GPO Box 3648
Sydney NSW 2001

By email ACCC-CDR@accc.gov.au

25 August 2020

Dear Mr Sims,

**Submission to the Australian Competition and Consumer Commission (“ACCC”):
Energy Rules Framework Consultation**

The Energy and Water Ombudsman (SA) Limited (“EWOSA”) welcomes the opportunity to comment on the ACCC’s consultation on the Energy Rules Framework Consultation.

EWOSA 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.

We note that the ACCC is proposing to make rules that align energy sector internal dispute resolution (IDR) requirements with existing requirements in the National Energy Retail Law and the Energy Retail Code (Victoria). The ACCC states that it is considering whether additional rules are needed to align energy sector IDR requirements with the banking sector IDR requirements.

EWOSA recommends that the IDR requirements for the energy CDR be aligned with that of the banking sector, as the recently released IDR Regulatory Guidance issued by ASIC sets a higher benchmark for banks than energy companies have under current energy laws. Of note is the enhanced promotion of both IDR and external dispute resolution (EDR) which we anticipate would lead to customers being better informed about their rights.

Should you require further information or have any enquiries in relation to this submission, please contact Jo De Silva via [REDACTED] or phone [REDACTED].

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jo De Silva'.

Jo De Silva
Policy and Communications Lead
Energy and Water Ombudsman SA

