

Essential Services Commission
GPO Box 2605
ADELAIDE SA 5001

Submitted electronically to: reviews@escosa.sa.gov.au

11 April 2025

Re: Review of the Retailer Energy Productivity Scheme Code – Draft Decision (Draft Decision)

To whom it may concern,

The EEC welcomes the opportunity to provide a submission on the Review of the Retailer Energy Productivity Scheme Code – Draft Decision.

The EEC notes that the South Australian Government is conducting a review of the REPS in parallel and has also provided a written response to the Department for Energy and Mining (DEM) under that review which complements this submission.

This submission focuses on key areas of the Draft Decision but the views contained in our submission to the 'Review of Retailer Energy Productivity Scheme Code – Issues Paper' in November 2024 remain current.

REPS accessibility and promotion

REPS2 needs effective promotion to increase community awareness and to lift participation rates to ensure that the REPS objectives can be met. Communication is key, particularly for vulnerable customers who can benefit the most from REPS activities. The EEC has also been made aware that targeted promotion of REPS is also needed for potential activity providers.

The EEC has heard that many customers find it difficult to find accessible and trusted advice and that some customers are unaware of REPS altogether. As set out in the EEC's previous submission, information about REPS on the Commission's website can be confusing and does not sufficiently set out the role of activity providers or the eligibility requirements of the REPS.

The EEC notes that while the Commission has commenced work to redesign information on its website its draft decision is not to require retailers to provide information about the REPS to customers through their websites or bills. The EEC suggests that the lack of consistent information from retailers significantly damages customers perceptions and understanding of the REPS and could limit the REPS achieving its objective. If the retailers are not responsible for promoting the REPS to their customers, then another organisation must fulfil this role including:

- Providing simplified information including an overview of REPS benefits, eligibility, the application process and the role of activity providers.
- Running proactive communication and marketing campaigns about the REPS generally, but also including:
 - Targeted communication to community-based organisations that support priority households.
 - Promotion of the REPS to potential activity providers.

This role could be performed by a sufficiently resourced team within the SA Government. Alternatively, an independent statutory body could provide a ‘one stop shop’ service for consumer information on energy productivity upgrades, including financial incentives available through the REPS as well as other state and federal incentives, lists of approved activity providers, etc. Victoria’s new State Electricity Commission (SEC) – a member of the EEC – provides a possible model, and the EEC would be happy to facilitate discussions with the SEC.

Compliance plans

The EEC supports the Commission’s draft decision to remove the requirement to submit an annual compliance plan and replace it with a requirement to submit a governance and compliance plan that will remain in place between 2026 and 2030, unless amended, alongside a new annual delivery plan.

The EEC notes that this decision may reduce the administrative burden on retailers. However, the Commission should clearly outline the required contents of the delivery plan.

Auditing

The EEC notes the Commission’s draft decision requiring retailers to audit a minimum of 5% of activities and provide the audit report(s) to the Commission.

The EEC recommends that further details on what constitutes an ‘audit’ are provided to retailers and whether the 5% applies to activities delivered or GJ (or other). The EEC recommends that audit requirements are robust enough to promote a level playing field in quality across retailers. It has also been suggested to the EEC that a 5% audit requirement is low, with some retailers already auditing a higher percentage of activities.

As stated in our previous submission, the EEC commends the increased level of audits carried out by the Commission last year and recommends an ongoing focus on compliance.

Thank you for your consideration of this submission. The EEC would welcome the opportunity to discuss these matters with you in detail.

For further information, please contact Amelia.Jarrett@eec.org.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jeremy Sung', with a stylized flourish at the end.

Jeremy Sung
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