

19 February 2017

Essential Services Commission  
By email to exemptionregister@esc.vic.gov.au

Dear Sir/Madam

***Re: Draft Decision – Register of non-licensed electricity providers: registration guideline (information for registration and public register)***

Thank you for the opportunity to comment on the *Draft Decision – Register of non-licensed electricity providers: registration guideline (information for registration and public register)*. As an industry-based external dispute resolution scheme, the Energy and Water Ombudsman (Victoria) (EWOV) provides alternative dispute resolution services to Victorian energy and water consumers by receiving, investigating and facilitating the resolution of complaints.

EWOV has applied for ESC approval to become the dispute resolution body for non-licensed electricity providers. This submission is made in anticipation of the approval of our application, which would see EWOV assuming responsibility for complaints from customers of non-licensed electricity providers from 1 July 2018.

EWOV strongly supports the Commission's proposed approach to the registrations system. The registration system will make it substantially easier for EWOV to manage the process of accepting new members. Most non-licensed providers required to register will also be required to join EWOV before 1 July 2018. Thus EWOV will have only a short period between approval as the dispute resolution body and 1 July 2018 to contact non-licensed electricity providers; explain the requirements of EWOV membership; seek applications and approve new members. For EWOV, transparent information about who these providers are and how they can be contacted, made available via the register, will expedite the joining process, meaning that more providers and customers will have immediate access to our dispute resolution process from 1 July 2018.

In our work to date preparing for this major change to the jurisdiction of our scheme, we have observed that obtaining necessary and complete information about non-licensed electricity providers – even those whose existence is known – is often difficult. EWOV therefore supports the Commission's proposal to collect and publish providers' ABN/ACN, trading name, contact point for customers and site names and addresses, in addition to the information specified in the legislation. This information is also likely to make it easier for customers to contact their provider to lodge complaints internally. This gives providers an opportunity to address complaints before they come to EWOV – a necessary prior step in the external dispute resolution process.

In its draft decision the Commission proposes to collect but not publish information about the number of customers being supplied or sold electricity. Should EWOV be approved as the dispute resolution body, membership fees are likely to be tied to the number of customers the provider serves. Voting

rights on the EWOV Board are also linked to customer numbers. As such, EWOV would like access to this information even if it is not published.

More broadly, knowledge of the scale and scope of non-licensed electricity supply and sale will be critically important to ongoing policy development on embedded networks and other non-licensed electricity providers. Therefore, we expect that the Commission will share this information publicly and with key stakeholders when it has been de-identified and collated.

We trust the above comments are helpful. Should you require further information or have any queries, please contact Matt Helme, Research and Communications Manager, on (03) 8672 4289 or [matt.helme@ewov.com.au](mailto:matt.helme@ewov.com.au).

Yours sincerely



**Cynthia Gebert**  
Energy and Water Ombudsman (Victoria)