

Our Ref: EWOQ
Your Ref: EMO0037

4 February 2019

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

aemc@aemc.gov.au

Dear Sir/Madam

**Re: Draft Report – Review of Regulatory Frameworks for Stand-alone Power Systems
– Priority 1**

Thank you for the opportunity to make a submission on the Draft Report – Review of Regulatory Frameworks for Stand-alone Power Systems – Priority 1.

Background to EWOQ

The Energy and Water Ombudsman Queensland (EWOQ) provides a free, fair and independent dispute resolution service for small electricity and gas customers across Queensland and water customers in south east Queensland who are unable to resolve a dispute with their supplier. Our submission is based on our experience as an external dispute resolution scheme dealing with residential and small business energy customer complaints in Queensland.

Feedback on the Draft Report

EWOQ welcomes the review of the regulatory framework for stand-alone power systems (SAPS) and in particular, the assessment of consumer protections for these off-grid consumers. With an increase in consumers adopting SAPS as an alternative to standard grid supply, it is critical that consumer protections comparable to those enjoyed by customers supplied by the grid be available to off-grid customers.

We endorse the Commission's draft position in its assessment of the application of consumer protections, which included:

- Retail price protections
- National energy specific consumer protections
- SAPS specific consumer protections
- Reliability standards for off-grid supply; and
- Jurisdictional consumer protections and access to concessions and rebates, independent dispute resolution, safety requirements and Guaranteed Service Level payments.

EWOQ supports, in principle changes to the National Energy Customer Framework and other jurisdictional legislative frameworks as the most efficient approach to providing customers in Distribution Network Service provider (DNSP) led SAPS the same consumer protections that cover grid connected customers.

Thank you for the opportunity to contribute to this draft report. If you require any further information regarding this matter, please do not hesitate to contact me on (07) 3087 9455.

Yours sincerely



Ilona Cenefels
General Manager – Reporting, Policy and Research

cc. Jane Pires