

20th December 2023

The Energy Reform Team
Essential Services Commission

By Email: energyreform@esc.vic.gov.au

Energy and Water Ombudsman Victoria – Submission to Gas Distribution System Code of Practice review: Draft decision

Thank you for the opportunity to respond to the Gas Distribution System Code of Practice Review. The Energy and Water Ombudsman Victoria (EWOV) provides free, independent redress to Victorian consumers by receiving and resolving energy and water complaints. We work to ensure fair and reasonable outcomes when energy and water problems arise.¹ We use our unique data insights about consumers' experiences of the Victorian energy and water markets to improve consumer and market outcomes, through our engagement with businesses, government, regulators and the wider community. Our work is guided by the principles in the Commonwealth Government's *Benchmarks for Industry-based Customer Dispute Resolution*.²

EWOV welcomes new provision of information obligations on gas distributors

- ***Clarifying process and cost***

EWOV welcomes the proposed information obligations on gas distributors to clarify the process and cost for both disconnection and abolishment of gas connections. EWOV has received cases highlighting confusion around both the process and cost of abolishment or disconnection of gas supply, including from tenants seeking to disconnect their rental accommodation from gas supply.

In the context of new solar installations, EWOV has received large numbers of complaints where required paperwork and process for installation have also been unclear for consumers. Alignment with the approach to overcome this would be desirable.

We welcome the new information obligations to clarify this information and would encourage alignment of process between the distribution businesses wherever possible to reduce potential for consumer confusion to avoid similar problems with gas disconnections or abolishment.

¹ See Clause 5.1 of EWOV's Charter: <https://www.ewov.com.au/files/ewov-charter.pdf>

² See EWOV's website: <https://www.ewov.com.au/about/who-we-are/our-principles>

- ***Difficulties in communications with customers***
EWOV supports clarifying how distribution businesses support customers and encourage proactive communication from distribution businesses to customers around processes for abolishment and disconnection or interrupted supply.
- ***Need to address language barriers for culturally and linguistically diverse (CALD) people***
EWOV requests that the ESC consider through the review of the Gas Distribution Code of Practice how Distribution Businesses will engage with customers who may face language and cultural barriers in understanding how to abolish or disconnect their gas supply.

Improve communication around new connection requirements and costs

- Where consumers choose to connect to gas mains, EWOV considers that there is room to improve communication and introduce additional information which can be communicated to a customer desiring a new connection (especially consumers building new homes and buying new houses). This information can be: obligation to provide viability and cost of a new connection compared to an electricity connection and information on energy mix.

EWOV suggests adding a reference to dispute resolution and resort to the ombudsman in notices from gas distributors to customers about non-compliance

- EWOV supports the proposal to add a new clause on non-compliance by distributors, mirroring clause 15 of the Electricity Code of Practice.

Particularly in the context of growing abolishment and disconnection of gas connections, we suggest there is value providing consumers with information about external dispute resolution and EWOV contact details on correspondence with consumers.

Other issues for consideration

- ***Consistency between gas and electricity Guaranteed Service Levels (GSLs)***
EWOV encourages considering the consistency between the electricity code and the gas code in relation to GSLs. EWOV also encourages considering the training of retail frontline staff to support alignment of retail and distribution functions.
- ***Communications and information provided to customers during outages***
EWOV notes differences between electricity and gas outages and supports clarifying communication requirements.
- ***Clarifying the roles of distribution businesses and retailers***
EWOV supports the ESC or various parties explaining the roles of retailers, distribution businesses and customers in relation to obligations for disconnection and abolishment. EWOV encourages clarifying when distribution businesses become involved following a customers' request for disconnection or abolishment to a retailer.

If you would like to discuss any aspect of our submission, please do not hesitate to contact, Janine Rayner (Assistant Ombudsman – Insights & Engagement) at [REDACTED] or Ben Martin Hobbs (Policy Insights & Engagement Manager) at [REDACTED]

Yours sincerely



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