

Dr Joanne Bright
Manager – Wholesale Markets and Networks Policy
Energy Division
Department of Industry, Innovation and Science
GPO Box 9839 Canberra ACT 2601
Lodged Online

15 March 2016

Dear Ms Bright,

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RE: National Electricity Law and National Gas Law Amendment Package

SACOSS is the peak body for the community services sector in South Australia, with a long– standing interest in the efficient delivery of essential services. We thank the Energy Council for the opportunity to comment on the Amendment Packages, a series of developments we have been monitoring for some years.

SACOSS support the general intent of the Amendments. Although the market has changed in some ways since these issues were first raised by the MEU, SACOSS appreciates the changes suggested should enhance overall market efficiency and oversight. Whilst we do not have any specific comments related to the drafting of the legislation, we do recognise a significant challenge when it comes to implementing these changes: AER resourcing.

In recent times, it appears to SACOSS that the AER is being requested to do considerably more work in an increasingly dynamic and changing environment, yet overall resourcing in the market monitoring departments look to have been relatively stable¹. Whilst SACOSS commends productive efficiency, placing significantly more monitoring requirements on the AER without adequate resourcing is unlikely to result in the full intent of the amendment packages being realised.

We thank you in advance for consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on (08) 8305 4211 or via jo@sacoss.org.au.

Yours sincerely,



Ross Womersley
Executive Director

¹ The AER Annual Reports for the past 3 years show 13 additional staff have been added to the Adelaide and Melbourne offices over the same period, and SACOSS presumes they were not all added solely to market monitoring departments despite significant additional work being required of them.