

Dr Patrick Walsh
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Essential Services Commission of South Australia
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Thursday 7th October 2010

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Dear Dr Walsh,

RE: Arrangements for Electricity Disconnections for Non-payment During Heatwave Conditions – Post Implementation Review and Draft Decision (September 2010)

ETSA Utilities has proposed two specific amendments to the Commission's heatwave disconnections policy: shifting responsibility to ETSA Utilities for determining "extreme heat days", and redefining the Average Daily Temperature (ADT) threshold.

SACOSS notes the Commission has made draft decisions in relation to these two matters – supporting a shift in responsibility to ETSA Utilities, making a minor amendment to the definition of "extreme heat days" but not supporting any change to the ADT threshold. We share the Commission's concern for the potential impacts on residential consumers' health and wellbeing as a result of having their electricity disconnected during prolonged periods of extreme heat.

SACOSS has reviewed the information presented in the consultation paper and is happy to support the Commission's DRAFT decision to make ETSA Utilities responsible for declaring "extreme heat days". SACOSS will assume that ESCOSA will continue to make its own assessment and to verify, *ex-post*, that the declarations are implemented.

SACOSS also supports the Commission's draft decision to reject the proposal to amend the ADT threshold. The examples presented in the consultation paper provide a persuasive argument that the threshold is only being triggered in extreme case and not, as suggested by ETSA Utilities, "in normal summer conditions".

Sincerely,



Ross Womersley
Executive Director

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The views expressed in this document do not necessarily reflect the views of the Consumer Advocacy Panel or the Australian Energy Market Commission.