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25<sup>th</sup> June 2013

Dear Eunice,

**Re: Draft Water Industry Hardship Policy for Minor and Intermediate Retailers**

As the peak body for the community services sector in South Australia, SACOSS has had a long-standing interest in the delivery of essential services. The cost of basic necessities, like water, impact greatly and disproportionately on vulnerable and otherwise disadvantaged people.

We thank Department for Communities and Social Inclusion (DCSI) for the opportunity to respond to the Draft Water Industry Hardship Policy for Minor and Intermediate Retailers.

### **Background and Introduction**

SACOSS has previously provided a submission on the Draft Water Industry Hardship Policy released by the DCSI in October 2012. As the water retail code was still being finalised by the Essential Services Commission of South Australia (ESCOSA) at the time, the need to develop separate Hardship Policies for the different classes of retailers was not known at that stage.

SACOSS accepts the establishment of three classes of retailers by ESCOSA: Major Retailers, Intermediate Retailers and Minor Retailers, and that there are different forms of regulation which apply to each class. SACOSS therefore accepts the need to develop a second hardship policy which would apply to minor and intermediate retailers, and that the first hardship policy will be applied to major retailers.

### **Discussion**

SACOSS acknowledges the need for specific references to Councils in the Draft Water Industry Hardship Policy for Minor and Intermediate Retailers, to reflect that some Councils charge households as ratepayers rather than explicitly as water/ sewer customers.

SACOSS notes that while there are some changes from the first hardship policy, SACOSS has no major concerns with the Draft Water Industry Hardship Policy for Minor and Intermediate Retailers. Therefore, SACOSS endorses the Draft Water Industry Hardship Policy for Minor and Intermediate Retailers.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ross Womersley', with a large, sweeping flourish at the end.

Ross Womersley  
Executive Director