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Dear Kristen,

RE: Review of the SA Residential Parks Concession Scheme

The South Australian Council of Social Services (SACOSS) is the peak body for the community services sector in South Australia, with an interest in the affordable delivery of essential services to communities across the state. We thank Department of Human Services (DHS) for the opportunity to provide feedback on its review of the *South Australian Residential Parks Concession Scheme, dated 1 July 2017* (the Scheme).

Residential Parks Concession Scheme

This Scheme is aimed at providing a single concession payment made directly to eligible residents of residential parks for water services, sewerage services and energy services. The Scheme also provides that residents of residential parks are eligible to separately apply for a *Medical Heating and Cooling Concession* (MHCC) and the *Cost of Living Concession* (COLC).

SACOSS has two suggested amendments to the Scheme, namely that:

- Residents of residential parks be eligible to apply for EEPS.
- The water concession align with the *SA Water and Sewerage Concession Scheme* by providing for a percentage based concession (with a minimum and maximum payment amount in line with that Scheme), and ensure the difference in water concessions amounts for tenants and residents who own their own dwelling under the Scheme take into account section 73(2) of the [Residential Tenancies Act 1995](#).

Eligibility to apply for EEPS

DHS consider making it explicitly clear (in the same way residents' eligibility to apply for MHCC and COLC is outlined in Clauses 2.7 and 2.8) that residents of residential parks are eligible to apply for the Emergency Electricity Payment under the *Emergency Electricity Payment Scheme* (EEPS). SACOSS acknowledges that EEPS currently requires an eligible recipient to be the account holder, thereby excluding residents of residential parks who are embedded network customers.

However, EEPS is also currently under review by DHS, and SACOSS will be calling for the eligibility requirement that the applicant must be the account holder be removed, to allow for all customers of embedded networks (residents of apartment blocks, caravan parks, aged care homes) to access EEPS in circumstances where those customers meet all other criteria.

Difference in water concessions amounts for tenants and dwelling owners

Currently, the Scheme provides for different water concession amounts for residents who own their own dwelling, from those who hold a residential park tenancy agreement (\$185 for dwelling owners compared to \$120 for tenants). This may have been reflective of the fact that tenants traditionally did not pay the water supply charge. However, section 73(2) of the *Residential Tenancies Act 1995* now provides for tenants to pay water supply charges as a default position (where separately metered), in the absence of an agreement otherwise:

Division 11—Statutory charges

73—Statutory charges

(1) It is a term of a residential tenancy agreement that the landlord must bear all statutory charges imposed in respect of the premises.

(2) However, the following provisions apply subject to subsections (3) and (4):

(a) rates and charges for water supply are to be borne as agreed between the landlord and tenant;

(b) in the absence of an agreement—

(i) if the supply of water to the premises is separately metered—rates and charges for water supply are to be borne by the tenant; and

(ii) in any other case—rates and charges for water supply are to be borne by the landlord.

SACOSS acknowledges that residents of residential parks may not have a separately metered water supply, in which case the default position will be that the resident will not have to pay for water supply charges. However, there still may be an agreement between the residential park owner / manager and the tenant that requires the tenant to pay those charges, in which case SACOSS suggests the tenant who pays a water supply charge should be able to access the same water concession amount as the resident who owns their own dwelling.

The SA *Water and Sewerage Concession Scheme* differentiates between payment amounts for tenants who pay only for water usage from tenants who pay for water usage and supply charges. SACOSS is seeking DHS consider making the same distinction for residents of residential parks to align with the *Water and Sewerage Concession Scheme*. Similarly, the water concession under the *Water and Sewerage Concession Scheme* is calculated as up to 30% of your total water bill for a financial year, subject to the set [minimum and maximum amounts](#). SACOSS would support a percentage-based concession for water and energy subject to minimum and maximum amounts not less than currently provided under that Scheme.

If you have any questions in relation to this submission, please contact Georgina Morris at georgina@sacoss.org.au or 8305 4214.

Yours sincerely,



Dr Catherine Earl

Director of Policy and Advocacy
South Australian Council of Social Service