



Tuesday, 21 September 2021

By email: dem.consultation@sa.gov.au

Department of Energy & Mining
South Australia
GPO Box 320
Adelaide SA 5001

Dear Sir/Madam,

Consultation on the proposed amendments to customer payment under Remote Area Energy Supply (RAES) Scheme Issues Paper

My name is Samantha Rudolph. I am a Wurundjeri woman, and the Aboriginal Policy Officer with Consumer Action Law Centre. I also work as part of an integrated practice project, a project which aims to address the systemic causes of consumer, credit & debt issues experienced by First Nations people and communities in Victoria. This letter has been endorsed by Mob Strong Debt Help and Financial Rights Legal Centre.

I am writing to you to show support for South Australian Council of Social Service's (SACOSS) submission to the Department for Energy and Mining on the *Consultation on proposed amendments to customer payment under Remote Area Energy Supply (RAES) Scheme Issues Paper*. SACOSS's submission highlights the same concerns that we have after reading the issues paper, particularly the:

- impact of mandatorily imposing the prepayment method on all customers in a prescribed class
- issues with focusing on a price signal to reduce consumption and demand in remote Aboriginal communities
- benefits and risks of the proposed payment options (involuntary prepayment vs. post payment with optional prepayment)
- proposed 'fit-for-purpose' consumer protection measures, as well as the overall inadequacy of the consumer protection framework for off-grid energy customers in regional and remote South Australia
- need to better identify and protect life support customers across the RAES scheme
- proposed implementation pathway and the inconsistency of the proposed regulatory amendment with National Laws and Rules.



At the heart of the SACOSS submission is the principle that energy is an essential service; consumers have a right to access it on fair and reasonable terms and must be protected from disconnection due to an inability to pay. SACOSS believes the South Australia Government's approach to solving the energy supply sustainability issues in the communities subject to this consultation must be shaped by robust transparent principles of equity, sustainability, affordability and fairness – ensuring all South Australian citizens are treated equally.

Utility issues have been an area of significant concern for Victorian Aboriginal communities for quite some time. These issues can be dated back to the 2013 *Civil and Family Law Needs of Indigenous People in Victoria report* (the 2013 *Indigenous Legal Needs report*), published by James Cook University's Indigenous Legal Needs Project.¹ Consumer Action Law Centre and VALS also outlined the ongoing issues of utilities in Victorian Aboriginal communities in our recently launched report, *Consumer issues in Victorian Aboriginal communities during 2020*.² To summarise the utility issues outlined in this report, we found that:

- bills for electricity, gas, and water are too often unaffordable
- access to essential services can be exacerbated by natural disasters such as bushfires
- there is a really substantial need for adequate and accessible concessions, including to alleviate high bills, such as is provided through Victoria's Utility Relief Grant Scheme (URGS)

Our own work has found that renters make up a larger proportion of callers seeking help with energy debt. Factors contributing to high energy debt for renters include lack of updated infrastructure, outdated and poorly insulated homes,³ and inefficient essential appliances like heaters or cooling units. We believe that addressing the underlying causes of high energy bills is a better approach to addressing unaffordable energy costs. If these issues were addressed, we could see a decrease in these issues in the future.

Although not all Aboriginal communities are the same, we face a range of systemic issues, and we know that utility issues are generally the same from state to state. The SACOSS submission not only outlines the reasons for change, but also outlines better solutions instead of pre-paid meters that will only be a 'band-aid' for much wider issues.

We also note that the health implications of these proposed changes could be devastating for community and agree with SACOSS' position.

First Nations people are strong and resilient, and we have a voice that needs to be heard. We ask for you to listen to us and hear what we need. Therefore, we support the recommendations made by SACOSS in its submission and ask that the Department does better and speaks to the community that these proposed changes will directly impact. The proposed changes are not a solution to energy issues in the community but will further broaden and strengthen the gap between First Nations people and the wider community. Implementing better measures and SACOSS' recommendations is one step to self-determination and we ask for your assistance to help us get there.

¹ M. Schwartz, F. Allison and C. Cunneen, Australian Indigenous Legal Needs Project (2013), *The Civil and Family Law Needs of Indigenous People in Victoria*, <https://apo.org.au/sites/default/files/resource-files/2013-11/apo-nid36506.pdf>

² <https://consumeraction.org.au/consumer-issues-in-victorian-aboriginal-communities-during-2020/>

³ <https://consumeraction.org.au/energy-assistance-report-second-edition/> page 33.

Please contact me on 03 9670 5088 or at samantha@consumeraction.org.au if you would like to discuss this with me directly or to arrange a meeting.

Yours faithfully



Samantha Rudolph
Aboriginal Policy Officer
CONSUMER ACTION LAW CENTRE

