



24 April 2013

Mr Ian Primrose
Senior Regulatory Manager
Essential Services Commission
Level 37, 2 Lonsdale Street
MELBOURNE VIC 3000

By email: elecindicators@esc.vic.gov.au

Dear Mr Primrose,

Re: The Essential Services Commission (ESC)'s Draft Decisions - Guideline 22 - Regulatory Audits of Energy Businesses (Draft Decision)

Thank you for the opportunity to provide comment on the Essential Services Commission (ESC)'s Draft Decisions - Guideline 22 - Regulatory Audits of Energy Businesses (Draft Decision).

The Energy and Water Ombudsman (Victoria) (EWOV) Limited is an industry-based external dispute resolution scheme providing alternative dispute resolution services to Victorian energy and water consumers by receiving, investigating and facilitating the resolution of complaints. In making this submission, we provide comments based on our experience of Victorian energy customer issues.

EWOV supports the ESC's decision to review the auditing process so that better quality audits are received which reliably demonstrate whether an energy business is compliant with its regulatory obligations.

Based on the results from the ESC's 2010-11 audits, it is clear that some energy businesses do have challenges with the timeliness of completing the audits, the robustness of the compliance and reporting mechanisms, and with actioning of the undertakings required by the ESC. EWOV welcomes and assumes that the ESC also has a plan for appropriate responses to audit breaches and will take action to rectify these findings.


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We trust the above comments are helpful. Should you require further information or have any queries, please contact Belinda Sandilands, Senior Research and Communications Advisor, on (03) 8672 4460 or at Belinda.Sandilands@ewov.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cynthia Gebert', with a stylized flourish at the end.

Cynthia Gebert
Energy and Water Ombudsman (Victoria)