

Mr John Pierce  
Chairman  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235



Marjorie Black House  
47 King William Road  
Unley SA 5061

P. 08 8305 4222  
F. 08 8272 9500  
E. [sacoss@sacoss.org.au](mailto:sacoss@sacoss.org.au)  
[www.sacoss.org.au](http://www.sacoss.org.au)

ABN 93 197 662 296

Lodged online

25 May 2018

Dear Mr Pierce,

**RE: Advance Notice of Price Changes**

Thank you for the opportunity to comment on the *Advance Notice of Price Changes Rule Change Request*. As the peak body for the health and community services sector in South Australia, the South Australian Council of Social Service (SACOSS) has an established history of interest, engagement and provision of proposed advice on the necessary market mechanisms for and regulation of essential services. Our research shows that the cost of basic necessities like electricity impacts greatly and disproportionately on vulnerable people. Our advocacy is informed by our members and direct consultations with consumers and other consumer organisations: organisations and individuals who witness and experience these impacts in our community.

SACOSS is broadly supportive of the proposed rule change. In particular, SACOSS welcomes the focus on avoiding bill shock through the provision of a ten day notice period. SACOSS notes that those on low incomes are particularly sensitive to price increases, and that the more notice provided enables greater choices in budgeting and other behavioural choices. SACOSS believes that the primary purpose of the rule change is to enable enhanced engagement in the broadest sense. This means that consumers will be able to engage in budgeting, energy efficiency actions and other modifications that support achieving payment security, in addition to just switching and saving through that means alone.

SACOSS understands that there would be cases where exemptions from providing notice would be appropriate, in order to avoid consumer notice overload. SACOSS also supports simplified notices being provided, in order to best encourage behavioural change.

We thank you in advance for consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on (08) 8305 4211 or via [jo@sacoss.org.au](mailto:jo@sacoss.org.au).

Yours sincerely,

Ross Womersley  
Chief Executive Officer