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Submitted by email to [SAelectricity2015@aer.gov.au](mailto:SAelectricity2015@aer.gov.au)

1<sup>st</sup> August 2013

**RE: AER's review of SA Power Networks Revenue Determination 2015 to 2020<sup>1</sup> -  
Framework and Approach**

Dear Mr Anderson,

Thank you for the opportunity to respond to your Invitation for submissions.

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

SACOSS is of the view that the Framework and Approach (F&A) for SA Power Networks **does need** to be revisited for the coming 2015-20 regulatory period.

We are of the view that sufficient progress in energy market reform has, or will, occur to justify a review. These reforms include the AER's Better Regulation Program, the introduction of the Regulatory Investment Test for Distribution and the recommendations of the AEMC's Power of Choice Review.

We thank you in advance for your consideration of our comments and look forward to your further consultation on the F & A in early 2014. If you have any questions relating to the above, 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,



Ross Womersley  
Executive Director

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<sup>1</sup> <http://www.escosa.sa.gov.au/projects/194/sa-power-networks-service-standard-framework-2015-to-2020.aspx>