



8 February 2019

Compliance and Enforcement  
Essential Services Commission, Victoria  
Level 37, 2 Lonsdale Street  
Melbourne, Victoria, 3000

Dear Essential Services Commission

### **Compliance and enforcement policy: Draft decision**

Powershop Australia Pty Ltd (**Powershop**) thanks the Essential services Commission (**ESC**) for the opportunity to provide comments on the Compliance and Enforcement policy (the **Policy**) draft decision.

### **The revised Energy Compliance and Enforcement policy**

Powershop welcomes the change in direction that the ESC is proposing to adopt in respect of the Policy, specifically the intention to move away from a prescriptive approach, to a more objective driven Policy based on risk and customer outcomes.

Powershop also appreciates the streamlining of approaches with the Australian Energy Regulator's policy.

### **Objectives of the new Policy**

While the objectives noted in the draft Policy, under 'Our Objectives', adequately cover consistency between fuels, competition and customer protections, Powershop's view is that the ESC should include an additional objective of ensuring that compliance activities do not hinder the efficiency of the retail market. Heavy compliance and reporting requirements greatly affect the efficiency of the retail market - which has flow on effects to competition, innovation, customer experience and cost.

### **Role as energy regulator**

Powershop notes that the tasks described in the draft Policy under the heading 'Our role as energy regulator', do not include a key discussion point of the draft decision, that being to aim to make decisions in a more timely manner. Powershop suggests including a line such as: 'assess issues in consultation with licensees and arrive at a decision as soon as reasonably practicable'.

If you have any queries or would like to discuss any aspect of this submission please do not hesitate to contact me.

Yours sincerely,

Haiden Jones  
**Operations Manager**  
Powershop Australia Pty Ltd