

COAG Energy Council  
Energy Security Board  
By email: [info@esb.org.au](mailto:info@esb.org.au)

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**RE: SACOSS Response to Consultation Paper on Actionable ISP**

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 supply of essential services including electricity. SACOSS research shows that the cost and supply of basic necessities like electricity have significant and disproportionately greater impacts on vulnerable people.

SACOSS is supportive of the process of work undertaken by the ESB in converting the Integrated System Plan (ISP) into action and welcomes this opportunity to provide high level feedback. We strongly agree with the ISP's intent to identify and prioritise system investments at **least cost** (particularly where costs are borne by consumers), while maintaining a view to the reliability and affordability as the energy system continues its transition. We have long been concerned about the pace of reform as the energy system transitions and remain focussed on questions of how risk is allocated between consumers and networks, and the extent to which cross-subsidies may operate between consumers (e.g. in the case of DER-related investments).

SACOSS notes the importance of processes such as the RIT-T in protecting consumers from inefficient investment, and recently engaged in its dispute resolution process in the South Australian Energy Transformation (SAET) project to ensure optimal outcomes for consumers. In principle we support the need to have consistent interaction and streamlining between the ISP and RIT-T, insofar that the rigour of the existing RIT-T assessments is maintained.

SACOSS endorses the positioning taken by PIAC in its joint submission around the need for a framework which supports whole-of-system outcomes, and welcomes the opportunity to remain engaged in the process.

If you have any questions, please contact Rebecca Law, Policy Officer, SACOSS via [rebecca@sacoss.org.au](mailto:rebecca@sacoss.org.au).

Yours Sincerely,



Ross Womersley  
CEO (SACOSS)