

Our ref: EDM#44720962  
Contact: Rudi James

1 March 2018

Mr Alex Kroon  
Projects Manager  
Economic Regulation Authority  
PO Box 8469  
PERTH BC WA 6849

Dear Alex

### **Electricity Licence Review 2018 – Discussion Paper**

I would like to thank you for the opportunity to provide Western Power's feedback on the changes proposed to the format of the Electricity Licence Templates and the terms and conditions applicable to electricity generation, transmission, distribution, retail and integrated regional licence templates.

Western Powers feedback is directed towards the Electricity Transmission and the Electricity Distribution Licence Templates.

#### **Proposal 1**

The ERA proposes restructuring the licence templates by:

- A. Inserting an index;
- B. Moving the licence-specific information from Schedule 1 to clause 2;
- C. Grouping licence clauses under related headings; and
- D. Identifying the applicable section of the Act to the licence condition, where relevant

***Western Power supports Proposal 1.***

#### **Proposal 2**

The ERA proposes an amendment to the definition of "applicable legislation" as follows:  
applicable legislation means:

- (a) the Act; and
- (b) the Regulations and the Codes

***Western Power supports Proposal 2.***

**Proposal 3**

The ERA proposes that all licences continue to require compliance with the Electricity Act and the relevant codes and regulations, but individual licensee compliance continues to be managed through the compliance reporting and audit process.

***Western Power supports Proposal 3.***

**Proposal 4**

The ERA proposes replacing the term “map” with “plan” to ensure consistency throughout a licence.

***Western Power supports Proposal 4.***

**Proposal 5**

The ERA proposes to update licences to reflect that the Electricity Industry (Customer Transfer) Code 2016 has replaced the Electricity Industry Customer Transfer Code 2004.

***Western Power supports Proposal 5.***

**Proposal 6**

1. The ERA proposes amending clause 1.2 to include the word “replacement” as follows:  
“A reference in this licence to any applicable legislation includes, unless the context otherwise requires, any statutory modification, amendment, replacement or re-enactment of that applicable legislation.”
2. The ERA proposes to amend the definition of “Codes” as follows:  
Code means:
  - (a) the Code of Conduct for the Supply of Electricity to Small Use Customers or any such replacement Code approved pursuant to section 79 of the Act;
  - (b) the Electricity Industry (Customer Transfer) Code ~~2004~~ 2016;
  - (c) the Electricity Industry (Metering) Code 2012; and
  - (d) the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.

***Western Power supports Proposal 6.***

**Proposal 7**

The ERA proposes that the current approach of including specific legislative obligations in licences is retained.

***Western Power supports Proposal 7.***

Yours sincerely

**Rudi James**  
Regulatory Compliance Manager