

9 November 2009

Mr Paul Kelly
Electricity Code Consultative Committee
c/o Level 6, Governor Stirling Tower
197 St Georges Terrace
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Dear Paul

AMENDMENTS AS A RESULT OF THE REVIEW OF THE *CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL USE CUSTOMERS*

I refer to the invitation to comment on the Economic Regulation Authority's (the Authority) proposed amendments to the *Code of Conduct for the Supply of Electricity to Small Use Customers* (the Code).

Submissions were requested by close of business on Friday 6 November 2009, but to the extent it is within the Electricity Code Consultative Committee's discretion to consider a late submission, Alinta Sales Pty Ltd (Alinta) offers the following comments on the proposed amended Code.

- Alinta suggests that the definition of "call centre" requires further consideration. The proposed amended Code defines it as a system that is capable of automatically recording some of all of the responsiveness indicators, while clause 6.1092(b)(i) makes reference to "call centre staff".

Alinta notes that the term "responsiveness indicators" is not defined in the Code, although it may refer to the data required to be reported by clauses 13.5 and 13.12. In addition, as implied by clause 6.1092(b)(i) call centres comprise of people, as well as one or more information technology and communications systems.

- There appears to be a potential inconsistency between the obligations imposed by clause 4.5(1)(z) and clause 10.11(2) of the amended Code. Clause 4.5(1)(z) requires that a retailer include the National Interpreter symbol on residential customers' bills (unless customers agree otherwise), whereas clause 10.11(2) appears to obligate a retailer to include the symbol on bills, reminder notices and disconnection warnings sent to both residential and non-residential customers.

If you require any additional information, or wish to discuss these comments further, I can be contacted on 9486 3749.

Yours sincerely

Corey Dykstra
Manager Regulatory Affairs
Alinta Sales Pty Ltd