

4 April 2007

Mr Paul Kelly
ECCC Chairman
C/o Level 6, 197 St Georges Terrace
PERTH WA

Dear Paul

Draft Review Report of the Code of Conduct for the Supply of Electricity to Small Use Customers

We are pleased to advise that our feedback to the committee is that the overall review of the code has resulted in a well considered and well prepared document – our congratulations to your committee. For your consideration Western Power does have some comments specific to areas that affect Western Power and these are provided below:

2.3.9 Priority Reconnection Register (discussion point 7.1)

Western Power keeps a register, on its outage management system, of customers who are dependant on electrical equipment for life support. The register is kept for the purpose of assisting Western Power in determining the order of reconnection in the event of an unplanned outage. It also enables Western Power to consider appropriate measures for these customers in regards to planned outages.

Western Power appreciates that the ECCC recognises the difference between the aforementioned register and the definition of life support contained in the Code.

Western Power submits that this existing register is clear evidence of a system that is working and is of benefit to a special, prescribed group of customers. Western Power therefore suggests that it is not necessary to codify any requirements in this area as Western Power already recognises this obligation and will continue to ensure a workable and acceptable system is in place.

4.4 Particulars on each bill

(1) in a meter identification number (clearly placed on the part of the bill that is retained by the customer).

In October 2006 we communicated with the Economic Regulation Authority our request for the National Metering Identifier (NMI) to be required on retailer bills to customers. For example Synergy currently place the meter number on bills (as well as their unique customer number).

The meter number is problematic for distributors as a means of finding premises, or for assisting customers (phone or web based self-service) as it contains alphanumeric sequences. The NMI is an industry standard that Western Power has adopted as the key identifier in Western Power's meter and customer database. The NMI is now an integral part of Western Power's fault and emergency process, and therefore any opportunity to identify this number to customers will be beneficial to customers in regard to service response.

Western Power therefore reiterates its request that retailers are obliged, by the Code, to show the National Metering Identifier on bills.

For comparison it is understood that the following interstate requirements are already in place:

South Australia Energy Retail Code – each relevant assigned meter identifier and assigned meter identifier checksum for the supply address.

Victoria Energy Retail Code – each relevant assigned meter identifier and checksum or, in the case of no assigned meter identifier, the customer's meter number or another unique identifying mark assigned to the customer's metering installation.

ACT Consumer Protection Code – the customer's National Metering Identifier and checksum.

NSW Electricity Supply (General) Regulations 2001 – the customer's National Metering Identifier and checksum, prominently displayed.

Our understanding is that from July 2007 Queensland will also require the National Metering Identifier to be shown on bills and all other forms of notices to customers.

19.8.2 Discussion – Application for Payment

Payments made by Western Power (subject to 14.7) direct to customers occurs when (14.5) Western Power failed to give appropriate notice of a planned interruption or (14.6) Customer Service response times are not met.

Western Power does not have a system or the technology that would be able to ensure automatic payments are made to affected customers. This is particularly the case for customers not notified of planned outages. We therefore request that the existing requirement of customers applying for payments should remain.

Western Power suggests that if a customer makes an enquiry, or complaint to Western Power, regarding a failure by Western Power to meet its obligations under 14.5 or 14.6 then Western Power would make a payment to that customer irrespective of their knowledge of their payment entitled. The customer's enquiry or communication to Western Power would be considered a request and thus entitle them to the payment.

19.11.1 Additional Service Standard payment

In regard to the timely repair of streetlights Western Power can understand that this is an area that could be covered by codified payments and notes that this is the case in some other States.

We do recommend that some caution is necessary prior to proceeding with the inclusion of a streetlight repair payment as there are many issues that need to be thought through carefully. Processes, communication, and impacts need to be considered and addressed prior to any new Code requirements in this area. Not least is the fact that many streetlights are not owned or maintained (repaired) by Western Power. A number of other entities are involved including; local councils, private estates, shopping centres, and Main Roads. Western Power could envisage some confusion and concern from customers and non-distributor entities that maintain streetlights if debate over customer penalty payments occurred.

Our submission is that payment for failure to meet targets in streetlight repairs be a matter for the next review of the Code. This would allow time for stakeholders to fully consider this new requirement including payment limits, who is entitled to claim and how, non-Western Power lighting, budgetary considerations etc.

Thankyou for providing Western Power with the opportunity to comment on the draft review of the Code. We look forward to the final version in due course.

Yours sincerely

Gino Giudice
Customer Services Manager