

16th March 2009

Mr Paul Kelly
ECCC Chairman
c/o Level 6, 197 St Georges Terrace,
PERTH WA 6000

**RE: Review of the Code of Conduct for the Supply of Electricity to Small
Use Customers**

Dear Mr Kelly

Thank you for providing this opportunity for Uniting Care West (UCW) to provide input into the Review of the Code of Conduct for the Supply of Electricity to Small Use Customers. We have two main concerns with the Code that we would like to bring to the Electricity Code Consultative Committee, these being Historical Debt and Late Payments.

8.4 Division 2 – Contents of a bill-Historical Debt

UCW strongly believes that any 'old debt' should be viewed as a separate issue to the consumer's current account for disconnection purposes. There should be negotiations to clear the old debt and not used as a lever to disconnect clients.

9.5 Clause 5.6 – Late payment fee

UCW believes that Consumers on low incomes/Centrelink benefits should not be charged late payment fees. While UCW understands that there are already provisions in the Code to waive late payment fees if the person receives a pension, has made a complaint or is on an instalment plan, if there was an addition to the Code that any customer who was considered by the utility to be experiencing 'financial hardship' would have there late fees waived, then all of those who need assistance will not have debts compounded by late fees.

Thank you again for the opportunity to submit a comment to the ECCC.

Yours Sincerely,

M. Muntinga
Manager
Independent Living Services