

Our ref: 6370814

Contact: Valentin Fyrst, Strategic Policy Officer – (08) 9326 4560

24 August 2009

Mr Paul Kelly
ECCC Chairman
c/o Level 6, Governor Stirling Tower
97 St Georges Terrace
PERTH WA 6000

Dear Mr Kelly

REVIEW OF THE CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL USE CUSTOMERS 2008

Western Power welcomes the opportunity to contribute to the Electricity Code Consultative Committee's (ECCC) review of the *Code of Conduct for the Supply of Electricity to Small Use Customers 2008 (Code)*.

Western Power acknowledges the importance of permitting the operation of pre-payment meters throughout Western Australia whilst improving the level of customer protection in relation to this type of meter.

Western Power's comments on specific sections of parts 9 and 13 of the Code are provided in Attachment 1.

Western Power is keen to contribute to the review process and open to discuss any issues the ECCC may wish to raise, either upon receipt of this submission or at a later date.

For further information, please contact Valentin Fyrst on (08) 9326 4560, or valentin.fyrst@westernpower.com.au.

Yours sincerely

GINO GIUDICE
MANAGER CUSTOMER ASSIST

Att.

REVIEW OF THE CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL USE CUSTOMERS 2008

WESTERN POWER COMMENTS

Section 9.4(2)

- There would be a requirement upon Western Power to install a pre-payment meter upon request.
- It should be noted that pre-payment meters currently used by Horizon Power can be reprogrammed to function as a standard meter.
- Western Power's position is that costs associated with the installation, reprogramming and/or replacement of meters should be charged to the retailer.

Section 9.5(1)

- There would be a requirement upon Western Power to install a pre-payment meter upon request.
- It should be noted that pre-payment meters currently used by Horizon Power can be reprogrammed to function as a standard meter.
- Western Power's position is that costs associated with the installation, reprogramming and/or replacement of meters should be charged to the retailer.

Sections 9.6(1)

- Western Power suggests that 5 days is adequate in metropolitan areas.
- However, Western Power would require 10 days in non-metropolitan areas, which is consistent with the *Electricity Industry Metering Code 2005*.

Sections 9.8(1)

- Pre-payment meters currently used by Horizon Power can be programmed not to disconnect at certain times of the day.
- However, pre-payment meters currently used by Horizon Power are not capable of recording the numbers of self-disconnects and their duration.
- Therefore, Western Power would not be in a position to provide this information to retailers.

Sections 13.7

- Pre-payment meters currently used by Horizon Power would be compliant with all proposed amendments (except for those under section 9.8(1)(a) (refer above).