



December 5, 2011

Mr. Tyson Self
Manager, Projects Access
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

Dear Tyson,

The Western Australian Farmers Federation (Inc.) (WAFarmers) thanks you for the opportunity to provide comment to the Economic Regulation Authority's *'Review of Western Power's Proposed Revisions to the Access Arrangement for the Western Power Network'*.

As background, WAFarmers is the State's largest and most influential rural lobby and service organisation. WAFarmers represents approximately 4,000 Western Australian farmers from a range of primary industries including grain growers, meat and wool producers, dairy farmers, pastoralists, horticulturalists, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$7.1 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental well being of that land.

In this submission, WAFarmers comments on an issue of significance to our members, being the conduct of Western Power staff and contractors when entering and conducting work on farm land. WAFarmers accepts that this issue may be outside the 'Service standard benchmarks' outlined in Western Power's document 'Proposed revisions to the Access Arrangement for the Western Power Network' (September 2011) however we believe that we are able to demonstrate that this issue should be a consideration, given its potential impact. Our submission therefore requests that the Economic Regulation Authority consider amending the Access Arrangements in this area.

Western Power's Customer Charter ⁽¹⁾ states:

Your property - Access to your premises

At times we need to access your property to read the electricity meter, inspect new electrical work, carry out maintenance on our electrical equipment, connect or disconnect the electricity supply and prune vegetation away from powerlines.

Our guarantees:

- *We or our representatives will wear or carry official Western Power identification, and show that identification to you on request.*
- *If you have powerlines (transmission or distribution) running through your property, and we need to carry out work on them, we will contact you beforehand to arrange a suitable time.*
- *We will respect your property and only remain there for the time it takes us to perform our role of supplying electricity safely to you and others.*

Despite this clearly defined commitment, WAFarmers members report that this customer charter is continually breached on farm land. WAFarmers members have consistently raised issues with the conduct of Western Power's staff and contractors over a number of years. As a part of this, in 2007 and 2008 WAFarmers and Western Power liaised regularly on their project entitled 'Working Together'. Western Power's media release of July 30, 2008 (Appendix 1) ⁽²⁾ clearly identifies a number of key areas which need attention, including biosecurity and a level of reimbursement for damages and/or production losses.

To reinforce their commitment, the Western Power 2008 Annual Report ⁽³⁾ states:

"Engaging in our rural communities Western Power has been developing an initiative for improving how we conduct our business in rural Western Australia, in particular our on-farm inspection and maintenance processes. The Working Together Policy will provide a framework to improve the way we communicate and work with rural landowners, providing guidelines on what they can expect when interacting with Western Power. In April 2008, a stakeholder workshop was held to seek input to a draft discussion paper, for further review at regional community workshops to be held in August 2008. The Working Together Policy will be implemented in June 2009."

Disappointingly, Working Together never eventuated and as such, these issues remain unresolved.

In terms of the potential impact of this issue, the '2008 Distribution Wood Pole Audit Review' ⁽⁴⁾ report states that Western power conducts over 155 000 individual pole inspections annually. Disappointingly, it also notes that Western Power contractors either lack, or do not adhere to even the most basic of accepted biosecurity practices when entering and leaving farming properties.

WAFarmers notes that in his submission letter to the ERA ⁽⁵⁾ Western Power Managing Director Doug Aberle comments "we have engaged extensively with our key customers, retailers and generators in the development of these revisions."

WAFarmers has not been a part of this consultation.

In closing, WAFarmers believes that Western Power repeatedly breaches its own customer charter in its dealings with farm businesses. Further, we contend that our previous efforts to engage with Western power have not led to meaningful outcomes in terms of improvement in their service delivery. These breaches significantly increase the biosecurity risk to Western Australia's natural environment and its agriculture industry.

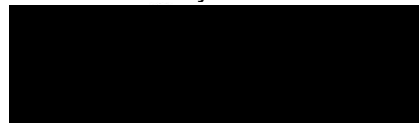
Whilst we recognise that this may not be a current consideration of the Access Arrangements, WAFarmers lists these issues, as without their consideration by the Economic Regulation Authority, we struggle to see where these issues will be addressed. Western Power seems uninterested or unwilling to respond to these concerns, as evidenced by their lack of completion of 'Working Together', and their failure to offer a replacement process.

Rather than taking a proactive approach to working with stakeholders, Western Power's current response is to simply recommend that WAFarmers advises their members to lodge their grievance with Western Power's complaints line. WAFarmers has no doubt that this simply masks the issue, as many of our members have advised us that they are unwilling to do so, through sheer frustration that "nothing will change" under Western Power's current management.

WAFarmers preference would be for Western Power to take responsibility for the actions of its staff and contractors and prevent, rather than react, to the problems they have already identified as occurring. Amending the Access Arrangements can ensure that this change occurs.

WAFarmers thanks you for your consideration of this submission. Should you wish to further discuss the issues raised in this submission, please do not hesitate to contact myself or WAFarmers Director of Policy, Alan Hill on (08) 9486 2100.

Yours sincerely



Mike Norton
President

References

1. Western Power's Customer Charter (viewed 15/11/2011)
http://www.westernpower.com.au/customerservice/customercharter/Your_property.html
 2. Western Power's Working Together media release (viewed 15/11/2011)
http://www.westernpower.com.au/aboutus/mediaCentre/mediaReleases/2008/Working_together_project.html
 3. Connecting Now - Western Power's Annual Report 2008.
<http://www.westernpower.com.au/documents/reportspublications/annualReports/annualReport2008/annualReport2008.pdf>
 4. Energy Safety Report (viewed 16/11/2011)
http://www.commerce.wa.gov.au/EnergySafety/PDF/Reports_and_discussion_papers/WesternPowerWoodPole.pdf
 5. Western Power's submission letter (viewed 15/11/2011)
http://www.erawa.com.au/3/1181/48/western_powers_proposed_revised_access_arrangemen.pm
-

Appendix 1.

Working together project

Western Power to hold workshops throughout the network on new Working Together Policy.

Have you ever wanted to tell Western Power what to consider when entering your rural property?

Well now is your chance, Western Power is inviting community members to attend workshops on a new policy it is designing to help it work better with rural landowners when working or entering their property.

The new policy will address four key areas:

- Customer Service / Access;
- Biosecurity;
- Reimbursement for damage or production loss; and
- Improved Western Power services.

In August Western Power will travel to 15 different destinations between Albany and Geraldton seeking feedback on the development of this new policy.

Western Power's Managing Director, Mr Doug Aberle said that this project was another step towards closer ties with the rural community.

"Western Power is conscious of the fact that its infrastructure affects thousands of landowners throughout rural areas of Western Australia and we recognise that that infrastructure impacts upon their operations.

"This new policy will provide a framework to improve the way we interact with landowners and will set clear standards and guidelines on what landowners can expect from their interactions with Western Power. It will also outline how landowners can assist Western Power to meet its obligations to ensure that safe and adequate power supplies are maintained.

Some examples of what will form part of the policy include:

- Minimising the spread of weeds, pests and diseases through the development of bio-security protocols;
- Implement a 'Code of Conduct' to help define responsibilities of Western Power staff and contractors whilst on rural properties. This would include induction, retraining, contact protocol, reporting, and biosecurity issues;
- Review and amend the process for dealing with damage and production loss claims on properties to ensure that claims are assessed in a timely manner;
- Develop an integrated landowner/stakeholder database to ensure accuracy and accessibility of landowner and property details which can be accessed by workers out in the field.