

Our ref: DM 3587382

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Assistant Director, Customer Protection
Economic Regulatory Authority of Western Australia
PO Box 8469
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Dear Madam:

**FINANCIAL HARDSHIP POLICY GUIDELINES, PROPOSED AMENDMENTS
(SEPTEMBER 2012)**

Horizon Power welcomes the opportunity to comment on the above-mentioned consultation paper.

Horizon Power is Western Australia's regional electricity provider. We are a state government-owned, commercially-focused corporation that provides power to about 45,000 customers (comprising more than 100,000 residents and 9,000 businesses, including major industry) across regional Western Australia.

Horizon Power manages two interconnected systems, the North West Interconnected System (NWIS) in the Pilbara and the interconnected transmission network between Kununurra and Wyndham, as well as 36 non-interconnected or islanded systems in regional towns and remote communities.

Horizon Power understands the guidelines have been amended to align more closely with the *Code of Conduct for the Supply of Electricity to Small Use Customers* (Electricity Code) and the *Compendium of Gas Customer Licensing Obligations* (Gas Compendium). We support this proposal and demonstrate below the extent to which Horizon Power's financial hardship policy already reflects the intended alignment. We also make a few additional comments.

Horizon Power already addresses the following Items in our Financial Hardship Policy (available on our website at

http://www.horizonpower.com.au/documents/FINANCIAL_HARDSHIP_POLICY3527534.PDF):

- 4.1 development in consultation with relevant consumer representative organisations

- 4.2 staff training
- 4.3 treatment of customers
- 4.4 ongoing consultation with relevant organisations
- 4.5 annual policy review in consultation with relevant organisations
- 4.7 suspension of disconnection and debt recovery procedures
- 4.8 reduction and/or waiver of fees, charges and debt
- 4.9 debt recovery
- 4.10 other obligations

As proposed, item 4.6 (guidelines that assist retailers in identifying residential customers in financial hardship) notes that ultimately the financial counsellors are in a better position to accurately diagnose those in financial hardship.

Horizon Power would not disagree with this statement, but we offer customers we believe are in financial hardship a series of assistance measures. These are listed in sections 2.2, 3.3, 3.6 and 3.7 of our policy.

Thank you for your consideration of our submission. Should you have any questions about it, please do not hesitate to contact Horizon Power's policy manager, Brenna Pavey, on 08 6310 1865 or at brenna.pavey@horizonpower.com.au.

Yours sincerely,

DAVID TOVEY
GENERAL MANAGER, CORPORATE AFFAIRS
COMPANY SECRETARY