



Your Ref: D105213v2
Our Ref: D106747
Contact: Paul Kelly

31 May 2013

Mr Lyndon Rowe
Chairman
Economic Regulation Authority
Level 4, Albert Facey House
469-489 Wellington Street
PERTH WA 6000

Dear Mr Rowe

ECCC advice on the proposed amendments to clause 9.13 – *Code of Conduct for the Supply of Electricity to Small Use Customers*

As requested by the Authority in its letter of 9 May 2013, I write to provide the advice of the Electricity Code Consultative Committee (ECCC) concerning the Authority's proposed amendments to the pre-payment meter (PPM) grandfathering provisions (clause 9.13) in the *Code of Conduct for the Supply of Electricity to Small Use Customers* (Code). The Authority's proposed amendments were outlined in its Draft Decision, published on its website on 10 May 2013.

The ECCC, as required by the *Electricity Industry Act 2004*, provided an opportunity for interested persons to comment on the Authority's proposed amendments between 13 and 24 May 2013. The ECCC received three submissions from:

- Synergy
- Western Australian Council of Social Service (WACOSS)
- Western Power

A copy of these submissions is attached (**Attachments 1 to 3**).

The ECCC considered the submissions received and noted that all three submissions supported the proposed amendments to the PPM grandfathering provisions and did not propose any additional amendments.

The ECCC resolved that it recommend that the Authority proceed with the amendments as outlined in its Draft Decision. The ECCC also noted Synergy's support for a review of PPM functionality as part of the next Code review.

If you have any queries regard this letter please contact me.

Yours sincerely

PAUL KELLY
CHAIRMAN
ELECTRICITY CODE CONSULTATIVE COMMITTEE (ECCC)

Attachment 1– Submission from Synergy



Our reference: DMS#3604169
Contact: Simon Thackray
Phone: (08) 6212 1433
Email: simon.thackray@synergy.net.au

24 May 2013

Mr Paul Kelly
Chairman ECCC
PO Box 8469
Perth WA 6849
By email: eccc@erawa.com.au

Dear Paul

**Code of Conduct for the Supply of Electricity to Small Use Customers ("Code")
Amendments to clause 9.13**

Synergy welcomes the opportunity to comment on the proposed amendments to clause 9.13 of the Code as detailed in the Economic Regulation Authority's draft decision.

Synergy supports the proposal to extend the grandfathering provisions for a further 12 month period on the basis it cannot source within the South West Interconnected System (SWIS) a pre-payment meter which complies with the functionality prescribed in the Code.

Synergy also supports a review of the pre-payment meter functionality as part of the next Code review. Synergy has recently experienced a situation where one of its pre-payment customer premises was fire damaged including the pre-payment meter. In the event new premises are constructed at the same site Synergy cannot deploy the same pre-payment meter previously available to the customer due to the current Code's requirements. As we cannot source a pre-payment meter within the SWIS which complies with the Code's requirement we are potentially facing a situation where the customer is denied a pre-payment service.

Yours sincerely ,

**SIMON THACKRAY
MANAGER RETAIL REGULATORY & COMPLIANCE**

Attachment 2 – Submission from WACOSS

Mr Paul Kelly
Chairman - ECCC
Economic Regulatory Authority
PO Box 8469
PERTH BC WA 6849

Sent electronically to eccc@erawa.com.au

21st May 2013

Dear Mr Kelly

Re: **Draft Decision on proposed amendments to the
Code of Conduct for the Supply of Electricity to Small Use Customers
– Pre-payment meters (9 May 2013)**

The Council has received notification pursuant to section 87 of the *Electricity Industry Act 2004 (Act)* of proposed amendments to the pre-payment meter provisions in the *Code of Conduct for the Supply of Electricity to Small Use Customers (Code)* by the ERA.

The Authority has sent a letter to the ECCC requesting its advice on a proposed amendment to clause 9.13 of the Code after receiving a request from Horizon Power. Horizon Power seeks to increase the period of time after the amendment date (1 July 2010) from 36 months to 48 months, by which pre-payment meters are required to comply with the Code.

The Council has met with Horizon Power to discuss these issues, and is satisfied that Horizon Power has made and continues to make reasonable endeavours to comply with Part 9.13 of the Code. We believe that under the circumstances it would be unreasonable to retain the current deadline, knowing Horizon Power is unable to meet that deadline.

The Council supports this decision to enable a reasonable period of time for Horizon to test its preferred pre-payment metering solution prior to full implementation and looks forward to a better outcome for consumers as a result. We will continue to liaise with Horizon Power on the roll-out of the metering trials.

Should you have any queries in relation to this or any other matter, please do not hesitate to contact Chris Twomey, Director of Social Policy on (08) 9420 7222 or chris@wacoss.org.au.

Yours Sincerely

Irina Cattalini
Chief Executive Officer
WACOSS



Western Australian
Council of Social Service Inc.
ABN 32 201 266 289

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Western Australia 6005

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Attachment 3 – Submission from Western Power

Our ref: DM10760888

24 May 2013

Mr Paul Kelly
Chairman ECCC
PO Box 8469
Perth Business Centre WA 6849

Dear Paul,

**CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL USE CUSTOMERS –
AMENDMENTS PROPOSED BY THE ECONOMIC REGULATION AUTHORITY**

I refer to the Electricity Code Consultative Committee (ECCC) notice dated 13 May 2013 inviting interested parties to make submissions regarding the Economic Regulation Authority's (**the Authority**) proposed amendment to the pre-payment meter provisions in the Code of Conduct for the Supply of Electricity to Small Use Customers (**the Code**).

The Authority has proposed amending clause 9.13 to increase the period of time by which pre-payment meters are required to comply with the Code from 36 months to 48 months. Western Power supports the proposed change.

Should you have any queries or require any further information regarding Western Power's submission, please contact Gino Giudice on 9326 4609.

Yours faithfully,

MEHDI TOUFAN
Acting General Manager Operations

Connecting people with energy

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