



16 February 2018

Alex Kroon
 Manager Projects
 Economic Regulation Authority
 PO Box 8469, Perth BC WA 6849

Dear Mr Kroon

RE: ERA Electricity Licence Review 2018

APA appreciates the opportunity to comment on the ERA's Electricity Licence Review discussion paper. APA is supportive of the ERA's recommendations and understands ERA's desire to provide clarification and consistency in relation to its regulatory licences.

APA's responses to specific questions raised by ERA in the review paper are provided below.

ERA Proposal	APA Response
<p>Proposal 1 The ERA proposes restructuring the licence templates by:</p> <ul style="list-style-type: none"> A. Inserting an index; B. Moving the licence-specific information from Schedule 1 to clause 2; C. Grouping licence clauses under related headings; and D. Identifying the applicable section of the Act to the licence condition, where relevant. 	<p>APA is supportive of Proposal 1.</p>
<p>Proposal 2 The ERA proposes an amendment to the definition of "applicable legislation" as follows:</p> <ul style="list-style-type: none"> (a) the Act; and (b) the Regulations and the Codes 	<p>APA is supportive of Proposal 2.</p>
<p>Proposal 3 The ERA proposes that all licences continue to require compliance with the Electricity Act and the relevant codes and regulations, but individual licensee compliance continues to be managed through the compliance reporting and audit process.</p>	<p>APA is supportive of Proposal 3.</p>
<p>Proposal 4 The ERA proposes replacing the term "map" with "plan" to ensure consistency throughout a licence.</p>	<p>APA is supportive of Proposal 4.</p>
<p>Proposal 5 The ERA proposes to update licences to reflect that the Electricity Industry (Customer Transfer) Code 2016 has replaced the Electricity Industry Customer Transfer Code 2004.</p>	<p>APA has no comment on Proposal 5.</p>

<p>Proposal 6</p> <p>1. The ERA proposes amending clause 1.2 to include the word "replacement" as follows: "A reference in this licence to any applicable legislation includes, unless the context otherwise requires, any statutory modification, amendment, <i>replacement</i> or re-enactment of that applicable legislation."</p> <p>2. The ERA proposes to amend the definition of "Codes" as follows:</p> <p>(a) Code of Conduct for the Supply of Electricity to Small Use Customers;</p> <p>(b) Electricity Industry (Customer Transfer) Code 2016;</p> <p>(c) Electricity Industry (Metering) Code 2012; and</p> <p>(d) Electricity Industry (Network Quality and Reliability of Supply) Code 2005.</p>	<p>APA is supportive of Proposal 6.</p>
<p>Proposal 7</p> <p>The ERA proposes that the current approach of including specific legislative obligations in licences is retained.</p>	<p>APA is supportive of Proposal 7.</p>
<p>Proposal 8</p> <p>The ERA proposes that Schedule 2, clause 1.1 is removed from ERLs and EIRLs where it relates to informing the licensee of licence and standard form contract amendments that are required if the licensee wants to change the scope of its retail activities to include new customer classes.</p>	<p>APA has no comment on Proposal 8.</p>

If you require further information or wish to discuss this submission please contact Naomi Donohue at naomi.donohue@apa.com.au or (07) 3223 3323.

Sincerely

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