Mr Paul Kelly
ECCC Chairman
PO Box 8469
PERTH BC WA 6849

Dear Mr Kelly

RE: Review of the Code of Conduct for the Supply of Electricity to Small Use Customers

As a small use customer as referred to by the abovementioned Code of Conduct, I would like to address the invitation by the ECCC to make comment and in particular to Recommendation 1 and 2 of the Draft Decision making amendment to Clause 4.1 – Shortening the billing cycle, and allowing billing more frequently of billing data is available.

Shortening the billing period to 26 days will allow retailers to issue bills up to 14 times a year (365/26). The current wording of the Code limits billing to a maximum of once per month (12 times per year). The effect this will have on the consumer if a retailer takes advantage of the potential 14 billing periods, will be to having more bills that can be subject to late payment, bill fees and penalty fees. It is inconvenient enough to have a bill arrive and forget to pay it, but when this can potentially happen more than currently permitted it could be costly to the consumer, especially to the poorer members of our community and the elderly. This timing also could have additional ramifications as it is less that a standard 2 fortnight pay period, meaning those struggling with payments currently could be short on their savings with the shortened billing period.

The justification for changing to 26 days because of delays due to the distributor's validation of data is not a real justification. According to the Metering Code 2012 clause 5.12, the retailer controls the request for energy data or the scheduling of energy data readings. As this is under the control of the retailer, there should be no need to change the 'once a month' wording of the Code of Conduct as if a retailer feels they will breach the Code, because they will receive data sooner than once a month, they should request the reading from the distributor to suit the once a month condition.

As for automation and programming of computer systems, businesses have been operating for easily over 50 years using computers and there are plently of businesses (and school students) that can code a once per month billing system (or a 14 period / year billing cycle if this change is made). I would expect also that our current market participants are compliant already to the Code of Conduct as this is not a new condition, so why would the Code need to change now.

Additionally the definition of monthly can only be taken as a calendar month, as there is no such definition of a 31 day month or a 30 day month or 28 day month or a metric month in the Code. Any reasonably minded person would understand the meaning of month in this Code. If a retailer can smooth payments for bills, surely a retailer can smooth requests for energy data for themselves using their automation, to issue a bill once per calendar month taking into accound any perceived delays following their requests. Even if a retailer does receive the data, I do not see anything in the codes that says a retailer must issue the bill immediately after receiving its data.

Related to this, is recommendation 2, which then allows the retailer to issue bills earlier than 26 days if the data is made available by the distributor. Again as the retailers are the controllers of the requests for energy data, they will have even greater power to request data on any period of time even down to a daily basis and issue bills as the data arrives, regardless of the 26 day or monthly limits. This is of particular concern for the near future, given the real time data a smart meter can provide.

The shortening of the billing period is an erosion of the protections of the consumer, and in this case, the changes have effectively removed the minimum billing period from the Code.

Your consideration is appreciated.

Thanks

Sean Christie

25 March 2018