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Sarah Lyons
Senior Project Officer
Economic Regulation Authority
PO Box 8469
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By online submission

13 September 2019

Dear Sarah

AGL welcomes the opportunity to review the Economic Regulation Authority's (**ERA**) Draft Decision detailing its proposed amendments to the Compendium of Gas Customer Licence Obligations (**Compendium**) published on 26 August 2019 (**Draft Decision**).

AGL appreciates the ERA's consideration of the issues raised by gas licensees as addressed in the Draft Decision and notes the advice set out in your email dated 26 August 2019 that other matters raised in AGL's previous submission will be considered in the upcoming review of the Code of Conduct for the Supply of Electricity to Small Use Customers (**Electricity Code**) to commence before the end of this year.

In relation to the Proposals set out in the Draft Decision, AGL offers the following comments:

Proposal 1 – amendments from the Electricity Code review

Overall, AGL supports the amendments proposed to align obligations between the two Codes. We look forward to providing feedback in the upcoming Electricity Code review in relation to any other issues not identified in our previous Compendium submission.

Proposal 2 – exceptions for issuing a bill more than once a month

AGL supports and agrees with the recommended change to allow a retailer to issue a final bill regardless of how the retailer became aware it needed to issue a final bill.

Proposal 3 – sending bills to deemed customers

AGL supports this change and agrees with its implementation as a practical solution in billing customers who have not entered into a supply contract with a retailer.

Proposal 4 – metering data

AGL supports the exemption set out in clause 4.7(3) of the Compendium for those retailers who use ATCO Gas Australia Pty Ltd's gas network as retailers do not manage the process to obtain metering data and it is appropriate that this obligation rests on ATCO under the relevant Retail Market Procedures (WA).

Note in clause 4.7(2), the amendment to clause 4.6(a) is incorrect in the marked-up version.



Proposal 5 – payment in advance

AGL supports the change to allow retailers the ability to set a maximum payment amount if the retailer considers it necessary provided the amount is not less than \$100.

Proposal 6 – disconnection and customers who have applied for a concession

AGL supports the change to clause 7.2(1)(d) of the Compendium to refer to those concessions administered by the retailer, which in practice only refers to the HUGS grants, and agrees this clarifies the limitation in relation to concessions in disconnecting customers for non-payment.

Proposal 7 – late payment and concession customers

AGL also supports the deletion of clause 5.6(1)(a) and agrees that the application of the current clause does not reflect how concessions are applied in the gas market.

Proposal 8 – reconnections requiring excavation

AGL is unclear if the timing of this proposed amendment is consistent with the ability of ATCO to reconnect a customer when excavation is required within the proposed 7 business days. We recommend that this proposed amendment is confirmed with ATCO.

Proposal 9 – gas safety awareness programmes

AGL supports the removal of this requirement on retailers and agrees that the network operator is best placed to provide this information as required under the relevant gas standards regulations.

Proposals 10 and 11 – retail market procedures

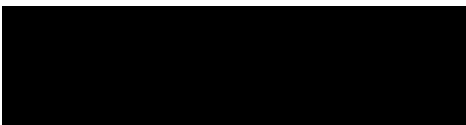
AGL agrees both changes are required and reflect the current terminology and definition.

Proposals 12 and 13 – drafting corrections

AGL agrees with these minor changes.

If you would like to discuss our comments further, please contact Sarah Silbert, Senior Network Relationship and Regulation Advisor, on 0400813300 or SSilbert@agl.com.au.

Yours sincerely,



Rebecca Bringham
Manager, Customer Markets Regulatory and Compliance