



10 September 2019

Paul Reid
Assistant Director Utility Services Regulation
Economic Regulation Authority
PO Box 8469
Perth BC WA 6849

publicsubmissions@erawa.com.au

Dear Paul

Draft Decision – Proposed amendments to the Compendium of Gas Customer Licence Obligations

Alinta Sales Pty Ltd (**Alinta Energy**) is pleased to provide comment on the amendments to the *Compendium of Gas Customer Licence Obligations (Compendium)* proposed by the Economic Regulation Authority.

Alinta Energy appreciates the inclusion, in the Draft Decision, of some of our suggestions made earlier in the review process.

Alinta Energy supports the recommendations in the Draft Decision and has only a few comments concerning the proposed amendments to the Compendium, as outlined below. We understand that a few further amendments may be made following the review of the *Code of Conduct for the Supply of Electricity to Small Use Customers* later this year.

Clause 1.3 Definitions for Schedule 2

Alinta Energy considers the definition of “**Gas Marketing Code**” should be amended to refer to the 2017 version of that code or, if gazetted later this year as anticipated, the 2019 version.

Clause 4.3 Bill smoothing

Proposed sub-clause 4.3(2)(f) requires that if there is a bill smoothing arrangement in place for a defined period or the arrangement has a specified end date then the retailer must, no less than one month before the end date, notify the customer in writing that the arrangement is coming to an end and of the options available to the customer once it has ended.

Alinta Energy notes that introducing this obligation may require modifications to retailers' billing systems and other internal processes and therefore sufficient time should be allowed to make changes as required.

Clause 4.5 Particular on each bill

Alinta Energy recommends sub-clause 4.5(1)(p) be amended to clarify whether “a summary of the payment methods” includes all payment methods made available by the retailer or only those applicable to the customer, similar to sub-clause 4.5(1)(f) which states “the applicable tariffs”.

For example, a non-standard contract may require a customer to establish payment by direct debit, so including information regarding how to pay by post or Bpay may not be appropriate in this instance.

We would support the amendment of sub-clause 4.5(1)(p) to “a summary of the applicable payment methods”.

Clause 4.7 Frequency of meter readings

Amend sub-clause 4.7(2) to refer to clause 4.6(a).

Clause 6.4 Alternative payment arrangements

We note the amendment to sub-clause 6.4(1) introducing a requirement for retailers to offer an instalment plan or other arrangement to a customer experiencing payment difficulties regardless of whether it is requested by the customer.

This amendment may require retailers to modify their Hardship Policy, Hardship Procedures and other internal processes and therefore sufficient time should be allowed to make changes as required.

We also note *payment difficulties* means being unable to pay an outstanding amount by reason of a *change in personal circumstances* (both italicised terms defined in clause 1.3) and, as such, we consider this amendment is not an open door to extending payment due dates to customers who do not meet the criteria specified in the Compendium.

Clause 7.1 General requirements

Amend sub-clause 7.1(1)(b) – “disconnection” is not a defined term.

Clause 8.1 Reconnection by retailer

Amend proposed sub-clause 8.1(3) – “reconnection” and “reconnected” are not defined terms.

If you have any questions concerning this submission, please contact me on 9486 3191 or catherine.rousch@alintaenergy.com.au .

Yours sincerely



Catherine Rousch
Manager Regulatory Compliance
Alinta Energy