



17 April 2020

Economic Regulation Authority
Level 4, Albert Facey House
469 Wellington Street
Perth WA 6000

Submitted online: <https://www.erawa.com.au/consultation>

Western Power amended Model Service Level Agreement

Alinta Energy welcomes the opportunity to provide a submission to the ERA in response to its consultation paper outlining proposed reforms to Western Power's Model Service Level Agreement.

Alinta Energy raises the following issues and suggested solutions for the ERA's consideration.



Clause	Issue	Proposed Solution
Metering Service Descriptions Schedule 2	<p>There is no regulated service allowing customers to change their “meter read route”, despite this being a common requirement.</p> <p>Instead, customers have been instructed to request this through a ‘miscellaneous service order’ and a generic ‘miscellaneous services’ charge is applied. As a result, the price paid for a meter read route change is not reflective of the cost of the service.</p>	<p>The MSLA be amended to include a service allowing customers to switch meter read routes and for a cost-reflective charge to be applied.</p>
Metering Service Descriptions Schedule 2	<p>Alinta Energy supports the proposed change to the service description of Standing Data provision (MS-3) which clarifies that users may use this service to request bulk Standing Data for multiple Metering Points.</p> <p>However, Alinta Energy notes that previous bulk Standing Data requests have created large administrative burdens for both parties. For example, Alinta Energy expects this service is often difficult for Western Power to provide; and notes that data is often provided in a format that is difficult for Alinta to reconcile and verify, causing iterations between Alinta Energy and Western Power.</p> <p>Additionally, this situation is recurring because Alinta Energy tends to require this service for data necessary for routine operations, including billing; and this data is not readily available via the web portal.</p>	<p>The MS-3 service description be amended to prescribe the format in which the Standing Data is provided. This will help customers interpret the data more easily and remove the need for iterations between customers and Western Power.</p> <p>However, Alinta Energy suggests a more efficient solution would be for the data that Alinta often requests via informal Standing Data requests to be made available via the web portal. This will reduce administrative costs for both Western Power and retailers in the long term. This data includes:</p> <ul style="list-style-type: none"> • CMD values for RT7/RT8 • An identifying flag for Grouped & Multiple Point of Supply NMI groupings (including the grouping # and the other NMIs in the group) • An identifying flag where a non-standard network tariff/contract exists. • The NMI’s network tariff history. • Information on whether any of the new AA4 reference services apply.

Invoices clause 4.2	Often extended metering invoices do not refer to the price and service list, making it difficult for customers to reconcile and verify whether they are being charged a cost-reflective price (for a service that is not contained in the MSLA) or the correct price for a service contained in the MSLA. As a result, retailers must query these invoices with Western Power, creating administrative burden for both parties.	A requirement, (in clause 4.2) for invoices to link the metering service being billed to a charge in the MSLA. If the service being invoiced does not match an MSLA item, Alinta Energy suggests Western Power be required to highlight this and provide information describing the service and substantiating the charge.
Force Majeure clause 6	Alinta Energy agrees with the ERA that while notification of a Force Majeure after two days is not appropriate in all circumstances, a requirement for more immediate notification would not always be possible.	Notification of a Force Majeure "as soon as reasonably practicable," as proposed by the ERA.
Liability clause 8	Alinta Energy considers the liability and indemnity clause is too broad.	Alinta Energy supports ERA's proposal for the Liability and Indemnity clause to be made consistent with the Standard Access Contract.
Service Standards clause 3.2	Alinta Energy agrees that terms including "appropriate access", "legitimate concern" (to safely access a property) and "other impediments" appear too broad and may expose retailers to liability if the metering services are not provided in these circumstances.	Alinta Energy supports ERA's proposal to require clarification of the terms exempting Western Power from being in breach of the service standards under 3.2(b).
Metering Charges Schedule 3	Averaging travel costs across all customers would create cross-subsidies between customers.	Alinta Energy supports Western Power's proposal to charge separate travel costs for country and metro areas, considering this provides an appropriate balance between cost-reflectivity and reducing the administrative burden associated with invoicing travel costs on a piece-meal basis.
Schedule 5	The proposed MSLA presents insufficient evidence to support Western Power's proposed cancellation fees being reflective of the cancellation costs. There is also a need for the MSLA to more clearly define where these fees are and are not payable.	Alinta Energy supports the ERA's request for evidence that the proposed cancellation fees and their terms are consistent with the Metering Code and are cost reflective. Alinta Energy also requests that a clause be introduced to define the conditions under which cancellation fees are (and are not) payable.
Timeframes and Service Levels	Alinta Energy supports the ERA's preliminary finding that the KPIs proposed to be included in the MSLA are not consistent with the requirements of clause 6.6(1)(b)(ii) to specify a timeframe for each service.	Alinta Energy supports the ERA's proposed amendment to remove the KPIs from the MSLA.



Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this in more detail, please contact me at oscar.carlberg@alintaenergy.com.au or on 0409 501 570.

Yours sincerely,

Oscar Carlberg
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