



10 May 2021

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

By email: publicsubmissions@erawa.com.au

Dear Paul

Re: Gas Licence Review 2020 – Issues Paper

Alinta Sales Pty Ltd (**Alinta Energy**) is pleased to provide comment on the amendments to the gas licence templates proposed by the Economic Regulation Authority (**ERA**) in the *Gas Licence Review 2020 – Issues Paper*.

Alinta Energy agrees with the proposed changes, which will make licences easier to navigate and will align gas licences more closely with electricity and water licences.

We would like to suggest some further minor modifications for consideration by the ERA:

- In the Gas Trading Licence template, replace “*Gas Marketing Code of Conduct*” in clause 6.2.1 with the defined term “*gas marketing code of conduct*” (i.e. no upper-case letters). The same term should be replaced in the definition of “*applicable legislation*” in clause 1.1.1.
- In both the Gas Trading Licence and the Gas Distribution Licence templates, replace the defined term “*Compendium of Gas Customer Licence Obligations*” in clause 1.1.1 with “*compendium of gas customer licence obligations*” or “*Gas Compendium*” or similar. The current drafting applies circular terminology to the definition. References throughout would need to be updated accordingly.

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 WA Retail Regulation
Alinta Energy

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