

10 March 2006

Alistair Butcher
Acting Director – Electricity Access
Economic Regulation Authority
6th Floor, Governor Stirling Tower
197 St Georges Tce
PERTH WA 6000

Dear Alistair

Approved Metering Service Provider Registration Scheme (Contractor Connect)

For a number of years Western Power has operated a registration scheme to certify electrical contractors to perform certain types of metering installation work. This scheme is called *Contractor Connect* and was approved by the Director of the Office of Energy Safety. Under clause 3.28 of the Metering Code (*Code*), Western Power may continue to register metering installation providers in this way, but Section 6.9 requires that the procedures be submitted to the Economic Regulation Authority (*ERA*) for approval.

Having reviewed the *Code* requirements, we believe that the Contractor Connect Scheme meets the requirements for an approved registration scheme, with very minor modifications as described below. We are therefore submitting the scheme documentation to the *ERA* for approval.

Given this is a long standing scheme previously approved by the Office of Energy Safety, and given that external contractors registered under this scheme fit the majority of meters in Western Australia, we would ask that you expedite the approval process. For the same reasons, we would also request that you allow the system to continue to operate as a transitional arrangement, since to do otherwise would cause significant disruption to building work across the state.

The only modifications from the existing scheme consist of expressly referencing the inspection system plan from within the Contractor Connect scheme to make clear the appeals process and the notification periods.

Please therefore find attached the following:

- Appendix A to this letter – comparing the Code requirements to the features of the scheme;
- A copy of the Western Power Inspection System Plan, which provides an overview of the scheme and explains the context in which it operates;

- A description of the scheme for electrical contractors, which includes details of the application process, ongoing inspections and deregistration;
- A copy of the approval documentation from the Director of the Office of Energy Safety.

Yours sincerely,

**ANDREW WOOD
METERING SERVICES MANAGER
CUSTOMER SOLUTIONS BRANCH
WESTERN POWER CORPORATION**

Appendix A – comparison between the Metering Code Requirements and the Contractor Connect Scheme

The following table summarizes the requirements of the Metering Code with regards to an approved registration scheme for metering installation providers, and cross –references this to the section of the Contractor Connect scheme that ensures compliance.

References:

1. *Contractor Connect Scheme* Scheme documentation DMS Ref. 1537257v2 File#: ED/80/1(27)V1
2. *Inspection System Plan* “Inspection System Plan and Policy Statement” published October 2003 and approved by the Director of Energy Safety

Metering Code		Contractor Connect	
Clause	Description	Section	Description
6.9(1)	A <i>network operator</i> may establish a proposed <i>registration process</i> and submit it to the <i>Authority</i> for its approval under Division 6.2.	All	Contractor Connect Scheme See also the Inspection System Plan, which references the scheme and details the inspection process.
6.9(2)	A registration process must at least:		
6.9(2)(a)	in relation to applicant <i>metering installation providers</i> , specify the criteria the <i>network operator</i> may take into account in considering an application for registration and authorising the work that may be carried out by the person; and	page 4 of <i>Contractor Connect Scheme</i>	Section describing <i>Scheme Entry Requirements</i>
6.9(2)(b)	contain appropriate checks, to the standard of <i>good electricity industry practice</i> , for competence of proposed <i>registered metering installation providers</i> ; and	Section beginning on page 9 of <i>Contractor Connect Scheme</i> Also <i>inspection system</i>	Sections describing: <i>Sample Inspection of Electrical Work</i> <i>Auditing of Electrical Contractors and Workers</i> <i>Validation of Notices and Scheme participants</i> Inspection system plan describes in detail Western

Metering Code		Contractor Connect	
<i>Clause</i>	<i>Description</i>	<i>Section</i>	<i>Description</i>
		<i>plan</i>	Power's system of electrical inspection.
6.9(2)(c)	provide for the deregistration of non-compliant registered metering installation providers	Sections beginning on page 4 of <i>Contractor Connect Scheme</i>	<p><i>Electrical Contractors and Workers Obligations</i> – failure to comply with the management plan results in deregistration. Workers only accredited while working for an approved contractor.</p> <p><i>Auditing of Electrical Contractors and Workers</i> – Audits occur initially six-monthly then annually. Failure of an audit will cause the accreditation status of the contractor or worker to be reviewed. Automatic removal of accreditation for serious or repetitive non-compliance.</p> <p>Process for accepting complaints from the public or other bodies (page 10).</p>
6.9(2)(c)	(including provision for reasonable notice of noncompliance)	<p><i>Section beginning on page 10 of the Contractor Connect Scheme</i></p> <p><i>Inspection System Plan, sections 3.3 and 3.5</i></p>	<p><i>Appeals Process</i> 14 days to appeal; decision within 28 days</p> <p><i>3.3. Dangerous and unsafe installations</i> Western Power will investigate and inspect all confirmed incidents of dangerous or unsafe installations. Where an installation is found to be unsafe or dangerous the following action is required:</p> <p>If the installation is connected to electricity supply:</p>

Metering Code		Contractor Connect	
Clause	Description	Section	Description
			<ul style="list-style-type: none"> • Isolate and tag the affected circuit. • Issue an Inspectors. Order and follow up if not responded to within 21 days. <p><i>3.5 Inspector's Orders</i> The following procedure applies to the issue of an Inspector's Order:</p> <ul style="list-style-type: none"> • Where the inspector, during the course of an inspection, identifies that the installation is not in accordance with the relevant standards, an Inspector's Order detailing the defect or non-conformances will be issued to the owner or person in control of the installation. • The style and format of an Inspector's Order is shown in Appendix H. • The relevant serious defect categories, as listed in Appendix D, will be entered on the Inspector's Order. • When the defect has been rectified, the Electrical Contractor is required to return the completed Inspector's Order to the nearest Western Power connection or inspection office. • All Serious defects will be re-inspected. • If no action has resulted following the issuing of an Inspectors. Order, a standard letter requesting the Electrical Contractor to attend an

Metering Code		Contractor Connect	
Clause	Description	Section	Description
			interview with the relevant inspector will be issued. Should a breach be confirmed, a complaint will be sent to the Energy Safety Directorate.
6.9(2)(c)	a reasonable cure period where appropriate, and	Sections beginning on page 9 of <i>Contractor Connect Scheme</i>	<p><i>Auditing of Electrical Contractors and Workers</i></p> <p>Non-serious compliance does not lead to removal of accreditation unless repeated. In all instances, Western Power “must be satisfied that appropriate measures have been implemented to ensure the non-compliance does not re-occur.”</p> <p>Re-accreditation is possible after 6-months where the party has “demonstrated significant work performance improvement.”</p> <p>Parties not allowed to join the scheme if they have incurred a serious defect in the last 6 months “unless they can demonstrate significant work performance improvement”</p>
6.9(2)(c)	a reasonable dispute resolving mechanism).	<p><i>From page 10 of the Contractor Connect Scheme</i></p> <p>System Inspection Plan section 3.8</p>	<p><i>Appeals Process</i></p> <p>4 days to appeal; decision within 28 days</p> <p>3.8.2. Appeal against an Inspector’s Order</p> <p>If a person is aggrieved over the contents of an Inspector’s Order, they will be advised that an appeal</p>

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			can only be made to the Director of Energy Safety at the Energy Safety Directorate as detailed in the Energy Coordination Act 1994, Section 19.