

Our Ref: DM#36741475  
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23 May 2025

Ms Sara O'Connor  
Chair, Electricity Code Consultation Committee  
Economic Regulation Authority  
Level 4, 469 Wellington Street,  
PERTH WA 6000

Email: [publicsubmissions@erawa.com.au](mailto:publicsubmissions@erawa.com.au)

Dear Sara

**2024 REVIEW OF THE CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL USE CUSTOMERS 2022 (CODE)**

I refer to the Electricity Code Consultation Committee's (**ECCC**) public consultation notice dated 5 May 2025 inviting comment on the Economic Regulation Authority's (**ERA**) draft decision to address the ECCC's 13 recommendations in its December 2024 Final Review Report.

Synergy supports the ERA's draft decision to address the ECCC's 13 recommendations.

Synergy notes that ECCC published in conjunction with the ERA's draft decision a Consultation Draft of the amended Code (**amended Code**) that seeks to reflect the ECCC's 13 recommendations.

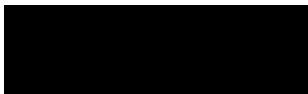
Synergy has three comments in relation to the amended Code relative to the ECCC's Final Review Report as follows:

1. Meter Testing: Inconsistency between ECCC Final Review Report and Consultation Draft of the amended Code regarding clause 28(3).
  - a. Synergy notes the ECCC recommendation (refer draft recommendation 3) was that a retailer must offer the option to use the refund of any **amounts paid for testing** as a credit on the customer's account in addition to the right to request a refund.
  - b. Amendments to clause 28(3) per the amended Code are in relation to crediting an energy data overcharge due to a defective meter, distinct from providing the customer with a right to have the meter test fee applied as an account credit or a refund (per the ECCC recommendation). Additionally, the drafted requirements duplicate those per clause 30 in relation to overcharges.

2. Life support initial registration: Inconsistency between ERA Draft Decision proposal regarding initial registration of life support equipment per clause 82 and amended Code per wording for clause 82(1A)(c).
  - a. Figure 1 of ERA Draft Decision proposal (page 9) noted that certification of initial registration did not extend to “Healthcare practitioner with specialist report” (however was accepted criteria for triennial confirmation). Per the amended Code clause 82(1A)(c) suggests that initial registration certification can be provided by a “Healthcare practitioner with specialist report”, meaning the initial certification requirements are extended beyond a specialist or a doctor with a specialist report.
3. Medical confirmation: Inconsistency in wording per amended Code regarding clauses 82 and 85, noting clause 82 refers to “medical practitioner confirmation” whereas clause 85 refers to “health practitioner confirmation”. Synergy’s preference is to amend clause 85 reference from “health” to “medical practitioner confirmation” for the purpose of consistency, noting clause 59(1) also refers to “medical practitioner confirmation”.

Please contact me should you have any queries in relation to the matters raised in this letter.

Yours sincerely

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**SIMON THACKRAY**  
**HEAD OF REGULATION AND COMPLIANCE**