

Our ref: ID60-978058709-10250  
Contact: Lawrence Muhuthia

23 May 2025

Sara O'Connor  
Chair  
ECCC  
PO Box 8469  
PERTH BC WA 6849

Dear Sara

**ERA Draft Decision – Amendments to the *Code of Conduct for the Supply of Electricity to Small Use Customers 2022***

I refer to the 5 May 2025 Electricity Code Consultative Committee (ECCC) invitation for public submissions on the Economic Regulation Authority (ERA) draft decision on the *Code of Conduct for the Supply of Electricity to Small Use Customers 2022 (Code)*, which includes proposed amendments to address the ECCC's 13 recommendations in the December 2024 Final Review Report.

Western Power welcomes the opportunity to respond to the Draft Decision and is providing comments on proposed amendments to the following clauses:

clause 3 – Terms used

clause 84 - Interruption of supply

**Draft decision:**

**Clause 3 – Terms used**

***complaint* means an expression of dissatisfaction made to or about [a person, related to their an-organisation, related to its](#) products, services, staff or the handling of a complaint, for which a response or resolution is explicitly or implicitly expected or legally required.**

*Western Power's response:*

Western Power does not support the draft amendment to clause 3 as shown above, which amends the definition of "complaint". In the majority of instances, the complaints received refer to products or services provided by Western Power and not to a person.

Western Power is of the view that a better approach is to retain the current definition included in the Code, which also reflects the definition used in *AS/NZS 10002:2022 Guidelines for complaint management in organisations*, which is in accordance with clause 87(3) of the Code.



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#### Clause 84 – Interruption of supply

Clause 84(1)(b): unless expressly requested by the customer or other nominated person not to do so, used its best endeavours to obtain acknowledgment from the customer, ~~someone else residing at the supply address,~~ or other nominated person, that the notice has been received.

Clause 84(3): If subclause (2) applies, the distributor must use its best endeavours to contact the customer, or other nominated person, ~~someone residing at the supply address,~~ before the interruption occurs.

*Western Power's response:*

Western Power does not support the draft amendments to clause 84(1)(b) and to clause 84(3). The removal of the words "*someone else residing at the supply address*" limits the ability of Western Power personnel to obtain acknowledgement that the Life Support Equipment (LSE) customer is aware of the planned power interruption and is able to prepare accordingly.

The first point of contact for Western Power personnel would be the nominated person, but in the event of the call going unanswered, contact will be attempted with the LSE customer who may not be able to answer the phone. But another person residing at the supply address such as a family member, will be able to check with the LSE customer and confirm whether they are aware of the scheduled power interruption.

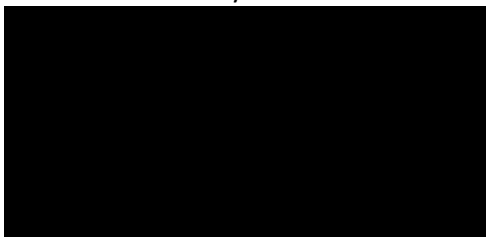
Retaining the existing wording in the Code will result in greater flexibility for Western Power and a better outcome for our LSE customers.

An exception to this process is the method used when notifying nursing homes, retirement homes and similar care facilities of a planned interruption and making contact with them to confirm receipt of the notification. The contact details are those provided by the retailer, usually for the main office of the facility, or a nominated facility contact. The LSE customers are not directly contacted by Western Power.

With respect to clause 84(3), Western Power supports the addition of the words "*other nominated person*".

Should you have any queries regarding this letter, please do not hesitate to contact Lawrence Muhuthia on [REDACTED]

Yours sincerely



**Zahra Jabiri**

Head of Regulation and Investment Assurance