



Alinta

Alinta Network Services
ABN 52 104 352 650

321 Ferntree Gully Road
Mount Waverley VIC 3149

Locked Bag 7000
Mount Waverley VIC 3149

Telephone +61 3 8544 9000
Facsimile +61 3 8544 9888

www.Alinta.net.au

7 March 2006

Mr Mark Dominkovich
Licensing, Monitoring and Customer Protection Division
Economic Regulation Authority (ERA)
PO Box 8469
PERTH BC WA 6849

Dear Mark

RE: Public Consultation Guidelines for - Electricity, Gas and Water Licences: Standard Form Contracts and Customer Service Charters

Alinta welcomes the opportunity to comment on the ERA's new consultation document that establishes the ERA's approach to consultation. The ERA paper sets out the requirements that licence holders must use in complying with the Governmental policy objective of the "public interest".

Alinta notes that the ERA paper states that such a cost benefit analysis could include the following areas:

- ecologically sustainable development
- social welfare and equity, including community service obligations
- occupational health and safety
- economic and regional development
- the interests of customers and classes of customers
- the competitiveness of businesses
- the efficient allocation of resources

This list of requirements presents a number of problems for public consultation which include:

- The likelihood that some of these could conflict with the principle of competition and economic efficiency;
- Many of the non-economic objectives may not have measurable outcomes;
- Such a wide ranging requirement will create uncertainties for those submitting; and
- Substantial resources may have to be given to relatively unimportant regulatory changes

If the Government and the ERA continues to use the "public interest" test the ERA should limit the test to the economic objectives and set out guidelines so that submitters are not left with such wide ranging criteria on which decisions may be made.

Should you have any further questions please feel free to contact me on 03 8544 9440.

Yours sincerely

Julie Buckland
Manager Regulatory and Government Relations